

GUNNISON COUNTY BOARD OF COMMISSIONERS
WORK SESSION MEETING AGENDA

DATE: Tuesday, January 27, 2026

Page 1 of 1

PLACE: Board of County Commissioners' Meeting Room at the Gunnison County Courthouse
(REMOTE OPTION BELOW)

8:30 am

- Colorado Communities for Climate Action Discussion

9:00 am

- Mt. Emmons and Water Quality Standards in Lower Coal Creek Update

9:30 am

- Break

9:40 am

- Wildfire Requirements for New Development Updates Discussion
- Adjourn

Please Note: Packet materials for the above discussions will be available on the Gunnison County website at <http://www.gunnisoncounty.org/meetings> prior to the meeting.

ZOOM MEETING DETAILS:

Join Zoom Meeting: <https://gunnisoncounty-org.zoom.us/j/89798905619>

One tap mobile

+12532158782,,82753657556#,,,,*471302# US (Tacoma)

+13462487799,,82753657556#,,,,*471302# US (Houston)

AGENDA ITEM or FINAL CONTRACT REVIEW SUBMITTAL FORM

Agenda Item: Colorado Communities for Climate Action Discussion

Action Requested: Discussion

Parties to the Agreement:

Term Begins:

Term Ends:

Grant Contract #:

Summary:

Colorado Communities for Climate Action Discussion

Fiscal Impact:

Submitted by: Holly Perry

Submitter's Email Address: hperry@gunnisoncounty.org

Finance Review:

Required

Not Required

Comments:

Reviewed by:

Discharge Date:

County Attorney Review:

Required

Not Required

Comments:

Legally sufficient. SO 1/22/26

Reviewed by: GUNCOUNTY1\sobaid

Discharge Date: 1/22/2026

Certificate of Insurance Required

Yes No

County Manager Review:

Comments:

Reviewed by: GUNCOUNTY1\jcattles

Discharge Date: 1/23/2026

Consent Agenda Regular Agenda Worksession

Time Allotted: 30

Agenda Date: 1/27/2026



Information for New Jurisdiction Members and New Board/Committee Members

Welcome to CC4CA! Here is some basic information to help you understand how the coalition functions and how your jurisdiction can engage with the coalition's work.

General information and internal communication:

- *CC4CA Roundup*: CC4CA staff circulates a general update (The Roundup) about once a month to all the representatives for each CC4CA member jurisdiction. This includes updates on advocacy efforts and the legislative session, member resources, and other information that might be useful to our members. We also distribute separate updates on funding opportunities, opportunities to engage in climate advocacy, and invitations to various briefings and workshops.
- *CC4CA Staff*: Board and committee members are encouraged to reach out to CC4CA staff at any time with thoughts, questions, or concerns.
 - *Lindsay Ex, Policy Director*: lex@cc4ca.org, 970-222-2912
 - *Anna McDevitt, Climate Funding Concierge*: amcdevitt@cc4ca.org, 952-454-6867
 - *Devon Reynolds, Policy Advisor*: dreynolds@cc4ca.org, 716-696-2862
 - *Anita Seitz, Advocacy Director*: aseitz@cc4ca.org, 303-817-5237
 - *Jacob Smith, Executive Director*: jsmith@cc4ca.org, 303-810-6017

Conference line:

- Most CC4CA calls use Zoom, but sometimes ad-hoc working groups will use different call-in info.

Some opportunities to engage:

- ***The Board of Directors and other committees and working groups.*** These are all described below.
- ***Testifying at legislative committee hearings and rulemaking hearings.*** CC4CA staff regularly flag upcoming testimony opportunities for the membership. CC4CA staff will also reach out to individual CC4CA member representatives or any other local officials that we think may be interested in either testifying generally or in that particular issue.
- ***Publishing guest opinions.*** As with testifying, CC4CA staff will flag opportunities, and staff will also reach out to any particular member representatives or other elected officials with member jurisdictions that have expressed an interest.
- ***Directly reaching out to individual state legislators and other officials.*** CC4CA staff will also flag opportunities for reaching out directly to important state and federal officials.

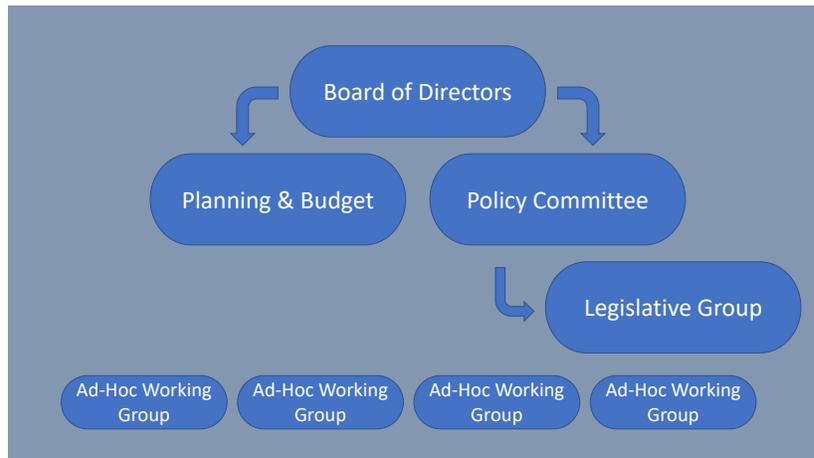
Participation on committees:

- ***Board of Directors.*** The Board of Directors sets CC4CA's overall direction in addition to specific responsibilities like managing the executive director, establishing and updating rules for CC4CA operations, and adopting updates to the CC4CA Policy Statement.

Each CC4CA member is asked to designate a representative to serve on the Board of Directors. These are typically elected officials or staff; the main criterion is the ability to speak on behalf of the member local government in CC4CA board discussions and decisions.

- Jurisdictions may also designate one or more alternates if they wish.
 - Each CC4CA member jurisdiction has one vote on the Board of Directors regardless of how many representatives are participating in a given Board meeting.
 - Board of Directors meetings typically take place via Zoom on the third Friday of every other month (February, April, June, August, October, December) from 9-10:30 am.
 - The Board typically holds a day-and-a-half annual retreat in June, which replaces the regular Board meeting that month.
- **Executive Committee.** The Executive Committee serves as a smaller cross-section of the full Board that can be readily available, responsive, and sufficiently nimble to make time-sensitive decisions and to engage more regularly with CC4CA staff.
 - The Executive Committee consists of the CC4CA President, Vice President, Immediate Past President, Board Chair, Board Vice Chair, Immediate Past Board Chair, and the chairs of the Policy Committee, the Finance Committee, and the Legislative Committee. If the Executive Committee does not include at least one representative each from the Front Range and the Western Slope, the Board will select an additional member to provide that representation.
 - The Executive Committee typically meets via Zoom on the third Friday of every other month, alternating with the Board of Director meetings (i.e., January, March, May, July, September, November).
 - **Finance Committee.** The Finance Committee oversees CC4CA’s finances, budgeting process, and organizational structure issues. Specific responsibilities include preparing a proposed budget each year for the Board's consideration and reviewing monthly CC4CA financial reports.
 - Each member jurisdiction may appoint a Finance Committee representative and, if desired, one or more alternates.
 - Each member jurisdiction has one vote regardless of how many representatives are participating in a given meeting.
 - The Finance Committee typically meets via Zoom on the fourth Tuesday of every other month (January, March, May, July, September, November) from 11 am – noon.
 - **Policy Committee.** The Policy Committee directs the implementation of CC4CA’s policy advocacy efforts. Its work is guided by the Policy Statement and any additional direction from the Board. CC4CA’s advocacy work typically focuses on the state legislature, the governor, and relevant state agencies and rulemaking bodies, and it may at times focus on federal policymaking as well. The Policy Committee has two primary responsibilities: a) Preparing proposed updates to the CC4CA Policy Statement for the Board's consideration; and b) Overseeing CC4CA’s overall advocacy work, including making sure the work in various arenas (legislative, regulatory, Governor and administration) are appropriate integrated and aligned with CC4CA’s goals.
 - Each member jurisdiction has the option of appointing a Policy Committee representative and, if desired, one or more alternates. Policy Committee members are typically elected officials or staff, but alternatively may be community members vested with appropriate authority to represent and make decisions on behalf of the jurisdiction

- in Policy Committee meetings, such as a member of a jurisdiction’s sustainability advisory board.
- Each member jurisdiction has one vote regardless of how many representatives are participating in a given meeting.
 - When possible, Policy Committee members are asked to serve on the committee for at least two years.
 - The Policy Committee typically meets via Zoom on the second Thursday of each month from 1 – 2:30pm.
- **Legislative Committee.** The Legislative Committee is a subcommittee of the Policy Committee and is charged with coordinating and collaborating with staff on the granular and at times intense work of the annual legislative session. The Legislative Committee’s work is bounded by the adopted Policy Statement and any other policy direction it receives from the Policy Committee and the Board. It focuses exclusively on the legislature and CC4CA advocacy tied to legislative activity, including taking bill positions on behalf of CC4CA and overseeing legislative strategy.
 - Each CC4CA member jurisdiction may designate a representative to the Legislative Committee. Legislative Committee members are generally elected officials or staff, and they must be empowered with decision-making authority on behalf of their jurisdiction related to the Legislative Committee’s work. Jurisdictions may designate a community member so long as she/he is empowered in this way.
 - Jurisdictions may appoint one Legislative Committee alternate if desired.
 - Each member jurisdiction has one vote regardless of how many representatives are participating in a given meeting.
 - The Legislative Committee typically meets via Zoom from 12:15 pm – 1:30 pm on the first and third Wednesdays of every month from January through May, and on the first Wednesday of each month from June through December.
 - **Ad-hoc Working Groups.** The Board and other committees from time to time create ad-hoc working groups charged with specific tasks.





Colorado Communities
for Climate Action

Gunnison County
Board of County Commissioners
January 27, 2026

CC4CA Members

Adams County
Aspen
Avon
Basalt
Boulder
Boulder County
Breckenridge
Broomfield
Carbondale
Chaffee County
Clear Creek County
Crested Butte
Dillon
Durango
Eagle County

Edgewater
Erie
Fort Collins
Frisco
Gilpin County
Glenwood Springs
Golden
Lafayette
Lake County
Larimer County
Littleton
Longmont
Louisville
Lyons
Mountain Village

Nederland
Northglenn
Ouray County
Pitkin County
Ridgway
Routt County

Saguache County
Salida
San Miguel County
Snowmass Village
Summit County
Superior

Telluride
Vail
Westminster
Wheat Ridge
Winter Park



What We Do: Advocacy

Legislature

- Track, run, & engage on legislation
- Budget process



Regulatory

- PUC, AQCC, TC, ECMC
- Rulemakings, etc.



Executive Branch

- Agencies/programs
- Governor's Office



What We Do: Member Support

Elevating your voice & your community's voice

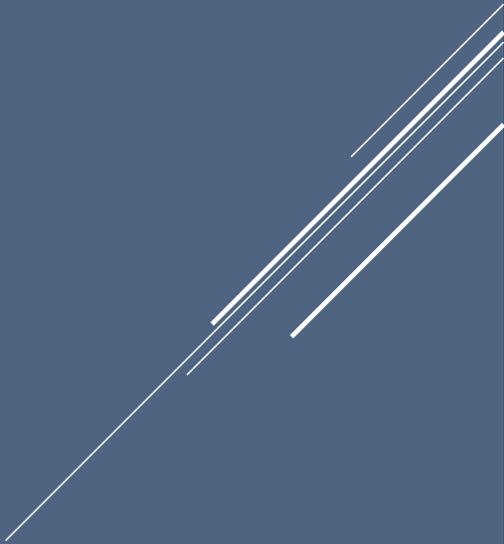
Workshops & trainings

Science & policy updates/briefings

Ad-hoc Working Groups

Climate Funding Concierge

Other resources

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Impact

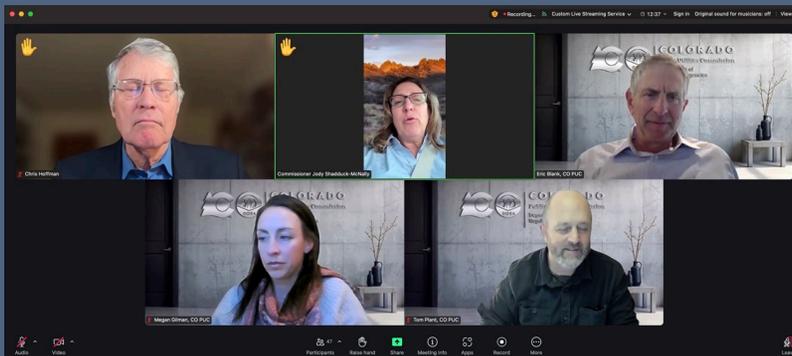
Regulatory proceedings (e.g., PUC Clean Heat Targets, Xcel “Just Transition Solicitation”)

Federal defense (e.g., 202C)

Passing climate forward bills (e.g., Extended Producer Responsibility)

Amending/killing problematic bills (e.g., solar permits, WUI Code Board changes)

2025 leg session: evaluated nearly 90 bills, substantively engaged on 50, and celebrated success on 41 of those



2026 Legislative Session Themes

Budget - \$1.2 billion shortfall

Trump – growing attacks on everything

Polis' last term

Concerns about affordability

Internal caucus divisions

New legislators



2026 Legislative Priorities

Tier 1

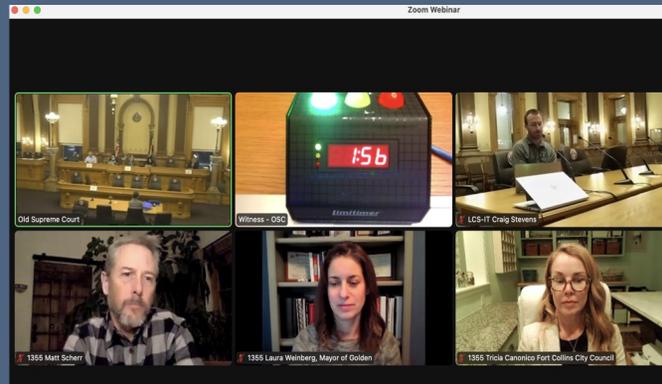
- PUC sunset/reauthorization
- Data centers

Tier 2

- Building decarbonization
- Carbon free electricity
- Climate resilience
- Maintain & strengthen existing climate protections
- Environmental justice and equity

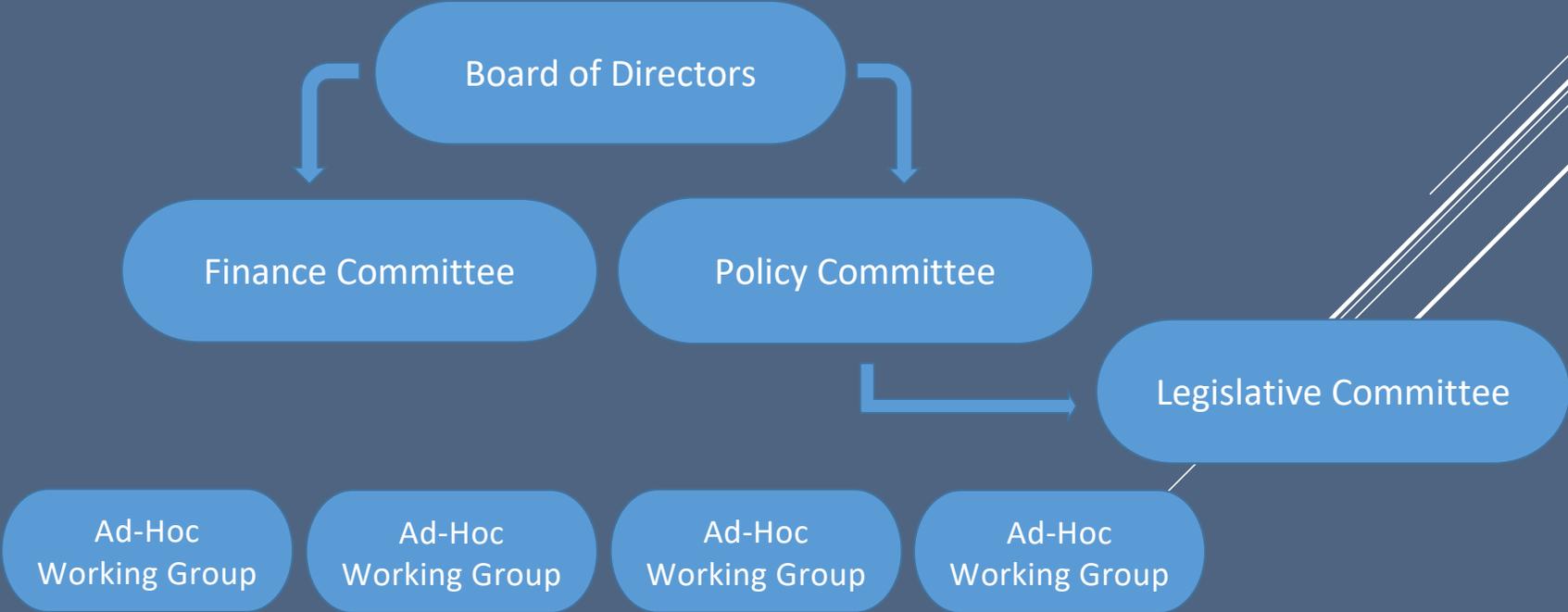
Tier 3

- Emission reduction from transportation, air quality/ozone, solid waste, tax and fiscal policy (esp. local governments)



How to Engage

CC4CA Board of Directors and Board Committees (Policy, Leg, Finance)



How to Engage & How We Can Support You

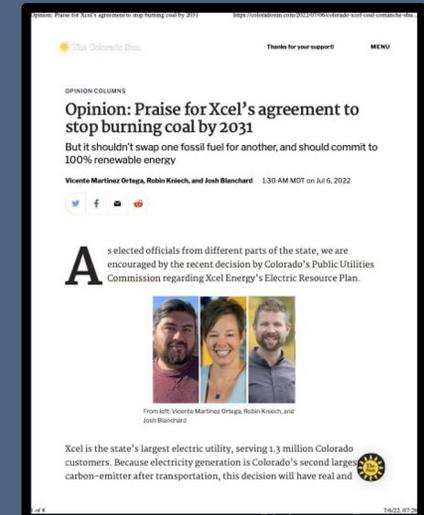
Testimony (legislative, regulatory, etc.)

Written comments for regulatory hearings

Outreach to & meeting with state/federal legislators

Publish LTEs and guest editorials

Sign up for CC4CA newsletters



Join Us in June: CC4CA Annual Meeting

June 10-12, 2026

Vail, Colorado

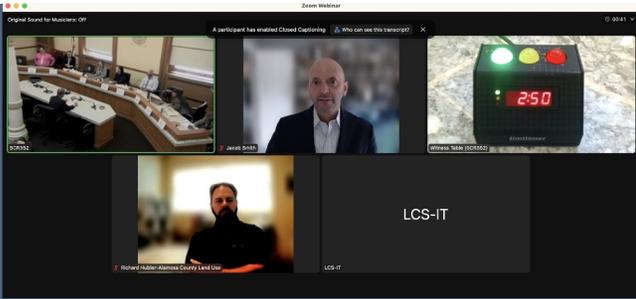
Email Jacob (jsmith@cc4ca.org) or Lindsay (lex@cc4ca.org)





Colorado Communities
for Climate Action

Jacob Smith, Executive Director
jsmith@cc4ca.org





https://www.coloradopolitics.com/opinion/impacted-communities-more-than-ready-for-oil-and-gas-rulemaking-opinion/article_43463cac-b246-11ed-89c9-b648b26591a.html

Impacted communities more than ready for oil and gas rulemaking | OPINION

By Jean Lim
Feb 22, 2023



Jean Lim

Nearly four years after the law was changed to protect public health and safety, the permitting of oil and gas development continues without addressing the cumulative impacts.

In 2018, the Colorado Oil and Gas Conservation Commission approved the wedging of 84 wells among dense residential neighborhoods in Broomfield.

Dismayed health and safety advocates turned their efforts to ensuring that this would never again occur, resulting in landmark changes to state law in 2019 to prioritize the protection of public safety, health, welfare and the environment related

to oil and gas development. Nearly four years later, hope hangs by a thread as the Commission has not set a date to begin cumulative impacts rulemaking mandated by the 2019 legislation. We as local electeds must still advocate to protect our constituents.



https://www.coloradopolitics.com/opinion/pass-multi-faceted-bill-to-benefit-colorado-air-quality-opinion/article_4fc8ed5a-e318-11ed-a395-1fa86fa2770.html

Pass multi-faceted bill to benefit Colorado air quality | OPINION

By Julie Pignataro
Apr 25, 2023



Julie Pignataro

My community of Fort Collins, like so many along the Front Range, is grappling with serious air pollution challenges. I have the good fortune to live in a city where the community and my City Council colleagues share a commitment to taking this challenge seriously.

We have made extensive investments in transit, created an expansive low-stress bike network, and prioritized walkability. We are also focusing on compact communities and housing affordability to make it easier for everyone to drive less. This past month, City Council adopted regulations to restrict oil and gas development in our community through land use regulations. We have also partnered regionally to improve air quality — including work with Larimer County to enhance compliance for existing oil and gas wells, partnering with the North Front Range Metropolitan Area to prioritize regional investments in multi-modal infrastructure, or through the Regional Air Quality Council to



AGENDA ITEM or FINAL CONTRACT REVIEW SUBMITTAL FORM

Agenda Item: Mt. Emmons and Water Quality Standards in Lower Co

Action Requested: Discussion

Parties to the Agreement:

Term Begins:

Term Ends:

Grant Contract #:

Summary:

Coal Creek Watershed Coalition presentation to Update Gunnison Board of County Commissioners on Mt. Emmons and Water Quality Standards in Lower Coal Creek

Fiscal Impact:

Submitted by: Donita Bishop

Submitter's Email Address: dbishop@gunnisoncounty.org

Finance Review:

Required

Not Required

Comments:

Reviewed by:

Discharge Date:

County Attorney Review:

Required

Not Required

Comments:

Legally sufficient. SO 1/22/26

Reviewed by: GUNCOUNTY1\sobaid

Discharge Date: 1/22/2026

Certificate of Insurance Required

Yes No

County Manager Review:

Comments:

Reviewed by: GUNCOUNTY1\jcattles

Discharge Date: 1/23/2026

Consent Agenda Regular Agenda Worksession

Time Allotted: 30

Agenda Date: 1/27/2026



MEMORANDUM

Date: January 20, 2026
To: Gunnison Board of County Commissioners
From: Ashley Bembenek, Executive Director
Coal Creek Watershed Coalition
Re: Update on Mt. Emmons and Water Quality Standards in Lower Coal Creek

Gunnison County (County), the Town of Crested Butte (Town), and Coal Creek Watershed Coalition (CCWC) collaborate to monitor and protect water quality in Coal Creek. This memo provides a brief update on the water quality standards applied to the lower portion of Coal Creek¹ for the January 27, 2026 Work Session.

Background

In February 2016, the County, Town, Colorado Department of Public Health and Environment, and Division of Natural Resources executed a [Memorandum of Understanding](#) (MOU) with Mt Emmons Mining Company (MEMC) prior to the company acquiring the Keystone Mine site. The MOU established eight goals, including to “collaboratively work to develop site-specific water quality standards for Coal Creek”.

The Keystone Mine Water Treatment Plant is subject to a Colorado Discharge Permit System permit. The permit was issued in 2008 and became administratively continued in 2013. When the discharge permit is renewed, the permit will likely include new and more stringent limits and additional requirements. Water quality standards are incorporated into discharge permit limits.

Since the Colorado Water Quality Control Commission (WQCC) adopted numeric standards in 1981, Coal Creek has struggled to attain the water quality standards due to past mining activities and natural geology in the watershed. Temporary modifications have applied to Coal Creek, in some form, since 2006. Currently, the temporary modification is for cadmium from 4/1 to 6/30 and expires on December 31, 2027.

The WQCC may adopt temporary modifications where the following conditions are met: 1) water quality does not attain the water quality standard, 2) there is a demonstrated or predicted compliance problem at an existing permitted facility, and 3) there is significant uncertainty regarding the extent to which existing water quality is the result of natural or irreversible human-induced conditions.²

During the term of the temporary modification, MEMC must provide annual progress reports to the Water Quality Control Division (WQCD) and participate in biennial hearings before the WQCC to demonstrate that the temporary modification remains justified.

¹ Segment COGUUG12: Mainstem of Coal Creek, including all tributaries and wetlands, from a point immediately above the Keystone Mine discharge (38.867117, -107.023627) to the confluence with the Slate River, with the exception of Wildcat Creek.

² Paraphrasing CCR 1002-31 at § 31.7(3)(a).



2024 Annual Report on Temporary Modifications

On March 31, 2025 MEMC submitted an annual progress³ report to the WQCD, as required to maintain the temporary modification to the cadmium standard for the lower portion of Coal Creek.

Since acquiring the Keystone Mine Property, MEMC has completed several projects to reduce environmental hazards and improve water quality. In recent years, this work has included the up-mountain diversion system, which keeps clean water clean by routing surface water and shallow groundwater away from the Keystone fault system and mine workings where it would become contaminated, recontouring the tailings impoundments to improve stability and stormwater management, and other maintenance and characterization activities.

The Keystone Mine Water Treatment Plant no longer has a predicted compliance problem⁴ and is the strongest evidence to date that MEMC's reclamation work and water management activities are creating consistent improvements in effluent water quality. As a result, the temporary modification is no longer justified.

June 2026 WQCC Hearing

During the June 8, 2026 Rulemaking Hearing, the WQCC will consider MEMC's proposal to remove the cadmium temporary modification and a request for a future hearing date to consider potential revisions to the water quality standards applied to lower Coal Creek.⁵ MEMC has indicated that they may submit a proposal to revise the water quality standards in June 2027 or later. At this time, MEMC has not defined the scope of the potential proposal including the pollutant(s) or type of revision(s) to the water quality standards.

To support the upcoming WQCC hearing, MEMC hosted a stakeholder meeting on January 14, 2026. MEMC did not elaborate on the scope of the potential proposal to revise the water quality standards. MEMC reported that they plan to construct a new mine water treatment plant. The project will require local and state permits.

Conclusion

CCWC anticipates that the WQCC will delete the cadmium temporary modification, in June 2026, one year prior to their expiration because the MEMC Keystone Mine Water Treatment Plant is able to comply with the existing permit limitations.

MEMC's plans to replace the antiquated mine water treatment plant will help assure that water quality in Coal Creek is maintained and potentially improved.

Assuring that the water quality standards in lower Coal Creek remain protective of aquatic life and other existing uses is consistent with the community's values and CCWC's mission. It is also important to assure that any potential changes to the water quality standards not cause unintended impacts, such as increased costs to municipal water or wastewater providers.

³ [August 18, 2025 Town Council Packet](#) at page 270.

⁴ *Id* at page 259- see Tables 2 and 4.

⁵ [MEMC Triennial Review Informational Hearing comments](#).

Overview of the Northwest Colorado Council of Governments Water Quality/Quantity Committee (QQ)



Gunnison Board of County Commissioners
January 27, 2025

P.O. Box 2308 970-286-4804
Silverthorne, CO 80498 kgreen@nwccog.org

QQ was founded in 1978 and is the only group of local governments in the state dedicated to water quality and quantity protection of Colorado's headwaters. The QQ Region is united by its iconic landscapes, the growing importance of its recreation and tourism economy, rising pressure from state and interstate water demands, and the potential degradation of its waters.

QQ comprises 47 member municipalities, counties, water and sanitation districts, and conservancy districts located in Routt, Grand, Summit, Eagle, Pitkin, and Gunnison counties, along with the Town of Carbondale. The Colorado River Water Conservation District and Upper Gunnison Water Conservancy District are relevant associate QQ members. The QQ Board is made up of elected officials and staff from member jurisdictions. QQ speaks with a united regional headwaters voice, with day-to-day work conducted by consultants who work under a contract approved each year by the QQ Board.

QQ's work focuses on 5 areas:

1. **Colorado Legislature.** Members of the QQ consultant team are registered lobbyists who focus on legislative proposals that would affect water quality/ quantity and local government authority to protect water resources.
2. **State and federal rulemakings.** On behalf of its members, QQ is a party in administrative rulemaking proceedings at both the state and federal level. Most commonly, QQ represents members in the Colorado Water Quality Control Commission (WQCC) hearings, which set stream classifications and water quality standards. Recent other rulemakings include those before the Colorado Water Conservation Board, Colorado Energy and Carbon Management Commission, the US BLM, USFS, Army Corps of Engineers, and EPA.
3. **Litigation.** QQ participates as a party in litigation in state and federal courts that implicate member jurisdictions' authority over water quality impacts of new development and water projects on private and public lands. QQ maintains a legal defense fund directed by its members.
4. **Ongoing policy-making.** QQ adds the Region's voice to the myriad stakeholder groups and committees that review and recommend relevant policy changes in Colorado. Some examples are the Colorado Water Quality Forum, the Colorado Land Use and Water Alliance, the Oil and Gas Local Government Roundtable, the Colorado Municipal Drought Taskforce, the Colorado and Gunnison Basin Roundtables, and the Colorado Water Conservation Board.
5. **Technical and legal support.** QQ consultants offer a combination of legal, public policy, water quality, and environmental science expertise to the membership. QQ is purposefully nimble and efficient to focus time and energy to whatever the most pressing water quality/quantity issues might be.

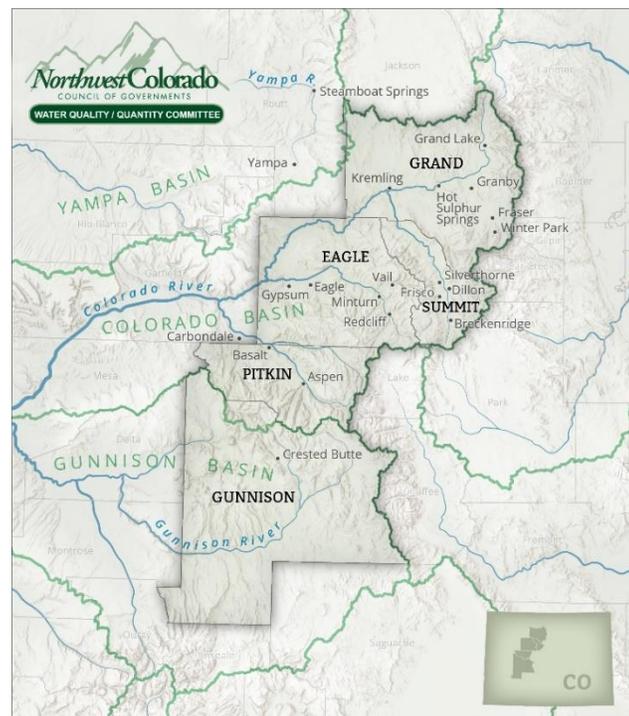
Ongoing Member Services

QQ addresses issues applicable to the entire QQ Region and those affecting individual member jurisdictions. A recent example in Gunnison County is water quality issues at the Pitch Mine, a uranium mine which may pose human-health and environmental concerns for the Tomichi and broader Gunnison Watersheds.

QQ meetings are a key forum for policy formulation and strategic decision-making by QQ members. Meetings are open to any staff and elected officials from a member jurisdiction who wish to attend.

Recent QQ Highlights

- Party to WQCC rulemakings to implement the Colorado Dredge and Fill permitting program, ongoing review of temporary modifications and site-specific standards for water bodies in the Region, and the revisions to the molybdenum water supply standards.
- Recognized partner with the Sonoran Institute and its Growing Water Smart Program. QQ hosted the first headwaters-specific regional Growing Water Smart Training, where a team from Gunnison County participated.
- Supported Gunnison County to address concerns with legislation aimed at second home ownership on public lands, lodging tax increases for environmental benefits, local authority to regulate oil and gas, and related issues.
- Continuing updates to the 2012 study commissioned by QQ, [Water & Its Relationship to the Economies of the Headwaters Counties](#). This study has been invaluable for conveying the importance of water in its natural course to the Region's economy.
- Engaged in ongoing implementation of Colorado's Water Plan including participation in the Drought Task Force ([SB23-295](#)) and the Water Secure Communities Advisory Committee.
- Provided support to local governments updating their Master Plans, Comprehensive Plans, land use regulations, septic regulations, and other water quality-related regulations.
- Continued to monitor activities that may impact water quality in the QQ Region, local ability to regulate for water quality protection, and key funding that impacts water quality in the Region.
- Joint party in the 2025 Colorado Water Conservation Board hearing to consider acquisition of the Shoshone Water Rights for instream flow purposes along with many QQ Members as the "Headwaters Party."



AGENDA ITEM or FINAL CONTRACT REVIEW SUBMITTAL FORM

Agenda Item: Wildfire Requirements for New Development Updates

Action Requested: Discussion

Parties to the Agreement:

Term Begins:

Term Ends:

Grant Contract #:

Summary:

Proposed updates to the wildfire code for new construction so that it is as stringent as the State wildfire code as required by Senate Bill 23-166 and proposed associated amendments to the LUR to align with the wildfire code and manning updates

Fiscal Impact: 0

Submitted by: Crystal Lambert

Submitter's Email Address: clambert@gunnisoncounty.org

Finance Review:

Required

Not Required

Comments:

Reviewed by:

Discharge Date:

County Attorney Review:

Required

Not Required

Comments:

Legally sufficient. SO 1/22/26

Reviewed by: GUNCOUNTY1\sobaid

Discharge Date: 1/22/2026

Certificate of Insurance Required

Yes No

County Manager Review:

Comments:

Reviewed by: GUNCOUNTY1\jcattles

Discharge Date: 1/23/2026

Consent Agenda

Regular Agenda

Worksession

Time Allotted: 90

Agenda Date: 1/27/2026



Gunnison County Community & Economic Development Department

Phone: (970) 641-0360

Email: planning@gunnisoncounty.org

Website: www.GunnisonCounty.org

From: Crystal Lambert, Building and Environmental Health Official

To: Board of County Commissioners

Date: January 20, 2026

Re: Updates to wildfire requirements for new development

Purpose

The State of Colorado adopted the Colorado Wildfire Resiliency Code ("CWRC:") on July 1, 2025 and jurisdictions have until April 1, 2026 to adopt a code for wildfire resilience that is no less stringent than the State CWRC.

The County's current wildfire code is the International Wildland Urban Interface Code ("IWUIC"), 2021 edition, which was implemented on January 1, 2023 and amended on November 7, 2023. There are some areas where the new State code is more stringent than the County's current wildfire code and adjustments will be necessary to meet the State's minimum code. There are also areas where the County's current wildfire code is more stringent or different than the State's new code creating an opportunity to evaluate which provisions remain appropriate for Gunnison County.

Representatives from the local building construction industry, including building contracting, development and design, landscape architecture, and materials supply, along with fire districts, and West Region Wildfire Council were invited to participate in a stakeholder engagement group to discuss the new State Wildfire Resiliency Code and the County's current wildfire code to identify which items would be appropriate to retain from our current code and help decide recommended modifications to the State minimum code for Gunnison County.

Background

Wildfire in Colorado is becoming more frequent and growing in intensity and devastation. Twenty of the twenty largest wildfires in state history have occurred in the 21st century (since 2001) and four of the top five largest wildfires in state history have occurred in the last five years (2020 and 2025). Additionally, the top five fires that have destroyed the most homes have occurred in the last 13 years, since 2012.

Wildfire impacts extend beyond property loss and are shared with the entire community through environmental damage, public health issues and economic impacts. There can be an increased risk of flooding and erosion due to post wildfire flows with increased risk of mudslides. Damage to watersheds can threaten drinking water supplies and aquatic species. Smoke from wildfires causes health risks to vulnerable populations, including children, the elderly, and those with pre-existing heart or lung

conditions. Communities affected by wildfires can experience economic losses with decreased home values, loss of businesses and negative impacts to agriculture, wildlife, tourism and recreation. There can be substantial recovery costs for rebuilding efforts, including debris removal, erosion control, infrastructure and road repair.

The *2025 Gunnison County Community Wildfire Protection Plan (“CWPP”)* provides comprehensive strategies to reduce wildfire risk and enhance preparedness so that our community can be ready to live with wildfire. <https://www.gunnisoncounty.org/1112/Community-Wildfire-Protection-Plan> The CWPP identifies building hardening and defensible space as key parcel-level strategies for community resilience.

In 2023, the Colorado State Legislature recognized that Colorado’s wildfire risk is increasing, and more communities are at risk of wildfire. Senate Bill 23-166 established a wildfire code board with the mission to ensure that Colorado Communities are safer from and more resilient to wildfire by reducing the risk to people and property through the adoption of statewide codes and standards based on best practice approaches to hardening structures and reducing wildfire risk in the defensible space surrounding structures in the wild-land urban interface in Colorado. The Colorado Wildfire Code Board consists of 21 voting members representing both rural and urban communities, building code professionals, fire code professionals, investor-owned utilities, commercial building professionals, home building professionals, architect with experience in wildfire codes, fire marshal with experience in wildland fire behavior, land use planning, hazard mitigation, nonprofit home builder for affordable home ownership, and county and municipalities with experience in implementing codes for wildfire resiliency and 3 non-voting ex officio members from the Colorado Division of Fire Prevention and Control, Colorado State Forest Service and the Colorado Resiliency Office. Since October 2023, I have served as a voting member of the Board, enabling me to contribute Gunnison County’s unique experience and rural perspective to the development of a code that works for all of Colorado. The Board met in person every month for over a year and a half and four advisory committees were created that met at least twice a month to focus on specific areas towards the creation of the Colorado Wildfire Resiliency Code. All meetings were posted and open to the public with public comment times at every meeting. Four public hearings were held around the state, in Sterling, Castle Rock, Montrose, and Glenwood Springs concerning adoption of the draft code and several hundred public comments, verbal and written, were received, heard and considered by the Board prior to adoption of the CWRC. Additional information about the Wildfire Resiliency Code Board, the Colorado Wildfire Resiliency Code and the State map can be found at the following website: <https://dfpc.colorado.gov/WRCB>

Overview of the Colorado Wildfire Resiliency Code

The CWRC defines the wildland-urban interface as “that geographic area where structures and other human development meets or intermingles with wildland or vegetative fuels.”

A map has been developed and designed as a tool for the application of the CWRC. The map encompasses both the current and potential wildland-urban interface as defined by the CWRC. For the purpose of code application and relevancy, the map only illustrates three levels of fire intensity (low, moderate and high). Low (yellow on the map) fire intensity areas correspond to Class 1 code requirements for construction and site hardening and Moderate (orange) and High (red) fire intensity areas correspond to Class 2 code requirements. The following is a link to the map:

<https://experience.arcgis.com/experience/34c113129c044004bc672ca5493378de/page/Page>

Jurisdictions can choose to adopt the State map or develop their own map. If a jurisdiction chooses to develop their own map it needs to be as stringent as the State map, including consideration of vegetative fuels, topography, local weather patterns, and fire behavior modeling data.

Adoption of the State map has several advantages, including elimination of local map maintenance and updating burden. The State map provides an accessible, printable and user-friendly online platform, and a ground-truthing process to verify or review a fire intensity classification.

The State map cannot be used for insurance purposes. Insurance companies use independent tools to assess risk and the Division of Insurance regulates all practices. The map is only used for the application of the Colorado Wildfire Resiliency Code. The insurance industry strongly supports building codes as a way to minimize and mitigate risk. Building codes can and do work to reduce risk during natural disasters and reduce risk of loss for individual property owners. Additional information about insurance and the Colorado Wildfire Resiliency Code can be found at the following link:

<https://doi.colorado.gov/wildfire-resiliency-building-codes-and-insurance>

The CWRC applies to new construction of structures and defensible space around structures, both residential and commercial. It is not a retrofit code and does not apply to existing development. Additions to existing structures that increase the footprint by 500 square feet or more will need to comply with the code for the area of the addition only. The code requires installation of a compliant roof covering when an existing roof covering is replaced or when 25 percent or more of the roof's surface area is replaced. Similarly, compliant exterior wall materials are required when 25 percent or more of the total exterior wall surface area is replaced. When the exterior wall material requirements are triggered, the 0–5 foot immediate structure zone must also be brought into compliance for defensible space.

The Class 1 code requirements are the least stringent and apply to all properties within the mapped wildland-urban interface. A summary of the Class 1 requirements are as follows:

Class 1 Exterior Building Materials

Roof-Covering or assembly classified as Class A when tested in accordance with ASTM E108 (UL790).

- Flame and ember protection of roofs--For roof assemblies where the roof covering profile creates a space between the roof deck, the space shall resist the entry of flames and embers.
- Roof Valley Flashing--No. 26 galvanized steel gage corrosion-resistant metal installed over a minimum 36" wide underlayment consisting of one layer of cap sheet complying with ASTM D3909 running the full length of the valley.

Gutters and downspouts-shall be constructed of noncombustible material.

Ventilation Openings-For enclosed attics, enclosed rafter spaces, and underfloor spaces shall be either:

- Tested in accordance with ASTM E2886, **or**
- Noncombustible corrosion-resistant mesh with openings not to exceed 1/8"

Class 1 Site & Area Requirements

Structure Ignition Zone 1 (0-5'), Immediate Zone

This zone is designed to reduce or eliminate ember ignition and direct flame contact with the structure, decks, stairs, and attachments. The requirements apply to the area from 0 to 5 feet from the structure.

- Use noncombustible, hard surface materials in this zone, such as rock, gravel, sand, concrete, bare earth or stone/concrete pavers.
Exception: Ignition-resistant plantings, per an approved list by the jurisdiction that is not less than that created by the Colorado State Forest Service, are allowed in the Immediate Zone.
- Remove all plantings including shrubs, slash, combustible mulch and other woody debris, with the exception of ignition-resistant vegetation.
- No planting of new trees in the immediate zone. Mature trees of no less than 10-inch diameter at 4.5 feet above ground level may be maintained. Tree crowns extending to within 10 feet of any structure shall be pruned to maintain a minimum clearance of 10 feet. Prune tree branches to a height of 6-10 feet from the ground or a third of the total height of the tree, whichever is less.

Site Signage

- Marking of Roads-Approved signs or other approved notices shall be provided and maintained for access roads and driveways to identify such roads and prohibit the obstruction thereof.
- Marking of fire protection equipment-Fire protection equipment and fire hydrants shall be clearly identified. (Don't disguise a hydrant as a shrub)
- Address markers-Buildings shall have a permanently posted address, which shall be placed at each driveway entrance and be visible from both directions of travel along the road.

Retaining Walls-Constructed with either noncombustible or ignition-resistant materials when any of the following conditions exist:

1. The wall is within 8 feet of a structure regulated by this code.
2. The wall is integral to the support of a structure.
3. The retaining wall is integral to the egress from a structure to a public way.

Fencing-Fencing within 8 feet of a structure shall be constructed with noncombustible or ignition-resistant materials. **Exception:** Vinyl fencing may be allowed.

The Class 2 code requirements apply to properties having a moderate or high fire hazard severity (orange or red on the State map). A summary of the Class 2 requirements are as follows:

Class 2 Exterior Building Materials

All the Class 1 items-Roof, gutters and downspouts, and ventilation openings.

Eaves and soffits shall be protected on the exposed underside by noncombustible, ignition-resistant, 1-hour fire-resistance-rated, 5/8" type X sheetrock, 2" nominal dimension lumber, or 1" nominal fire-retardant-treated wood.

Decks-Decking walking surface:

- Noncombustible materials
- Class A rated material
Except: composite decking can be Class B rating
- Fire-retardant treated wood identified for exterior use
- Ignition-resistant building materials

Glazing-Either multilayered panels, tempered, or have a fire protection rating not less than 20 minutes.

Exterior Doors-Noncombustible materials, solid core wood at least 1 ¾" thick, or 20 minute fire-protection-rated

Exterior Walls shall be constructed with one of the following methods:

1. Assemblies with a minimum of 1-hour fire-resistance rating, rated for exposure on the exterior side.
2. Approved noncombustible materials
3. Heavy timber or log wall construction
4. Noncombustible materials
5. Fire-retardant treated wood labeled for exterior use
6. Ignition-resistant materials

Such materials shall extend from the top of the foundation to the underside of the eave or the underside of the roof sheathing.

Exceptions:

1. Exterior wall embellishments and architectural trim (exclusive of trim on exterior windows and doors) not to exceed 5 percent of the square footage of the exterior wall.
2. Roof or wall top cornice projections and similar assemblies.
3. Solid wood rafter tails and solid wood blocking installed between rafters having a minimum dimension of 2" nominal.

Exterior wall coverings-Coverings shall be limited to the following:

1. Noncombustible materials.
2. Fire-retardant-treated wood.
3. Ignition-resistant building materials.

Exception: where options 1 or 2 (in Section 404.3 are used, vinyl siding may be used as an exterior covering.

Flashing-A minimum of 6 inches of metal flashing or noncombustible material applied vertically between the wall sheathing and the exterior cladding shall be installed at the ground, decking, and roof intersections.

Detached Accessory Structures located less than 50 feet from a building containing habitable or occupiable space shall have exterior walls constructed in accordance with Sections 404.3-404.3.2.

Underfloor Enclosure- Buildings or structures shall have underfloor areas enclosed to the ground or comply with the exterior walls in accordance with Section 404.3 (exterior walls).

Appendages and Projections shall be constructed in accordance with Section 404.3 (exterior walls).

Vehicle Access Doors shall resist ember intrusion by preventing gaps larger than 1/8". Gaps between doors and door openings shall be controlled by one of the following:

- Weather stripping
- Door overlaps onto jambs and headers.
- Garage door jambs and headers covered with metal flashing.

Class 2 Site & Area Requirements

All the Class 1 requirements- 0-5' immediate zone, retaining walls, fencing, site signage

Structure Ignition Zone 2 (5-30 feet), Intermediate Zone

Designed to give an approaching fire less fuel, which will help reduce its intensity as it gets nearer to structures. The requirements apply to the area from 5 to 30 feet from the structure.

- Dead Material shall be removed from live vegetation
- Fuels Accumulation-Avoid large accumulations of surface fuels such as logs, branches, slash and combustible mulch.
- Trees-Tree crowns extending to within 10 feet of any structure shall be pruned to maintain a minimum clearance of 10 feet. Prune tree branches to a height of 6-10 feet from the ground or a third of the total height of the tree, whichever is less.
- Shrubs-Shrub groups within this zone shall be spaced to prevent structure ignition. Shrubs shall be at least 10 feet away from the edge of tree branches.

Structure Ignition Zone 3 (30-100 feet), Expanded Zone

Focuses on mitigation that keeps fire on the ground.

- Tree crowns within this zone shall be spaced at a minimum of 6-10 feet.

Background of wildfire codes in Gunnison County

In 2018 Gunnison County received a grant from the Community Planning Assistance for Wildfire (“CPAW”) to help us understand our wildfire risk and provide specific recommendations to integrate wildfire-resiliency into the planning and development review process. The final recommendations from CPAW included adoption of the IWUIC, with amendments, definition of the WUI with the hazard assessment maps.

The CPAW team identified several challenges to addressing wildfire resiliency within land use planning in Gunnison County and many are still relevant today, such as existing developments without adequate wildfire safety and protection features (i.e. water supply, emergency access and neighborhood scale fuel mitigation), large transient demographic without knowledge of wildfire prevention and safety, such as evacuation routes, and a lack of voluntary engagement in wildfire mitigation practices. The CPAW team also identified a few opportunities that are still relevant today and have even become stronger since their assessment, such as our collaborative partnerships with local fire districts, the State Forest Service and the West Region Wildfire Council who provide assistance to further implementation of wildfire-ready and mitigation practices, such as fuel treatments, technical reviews on development applications, and assistance with on-site property assessments. Recently, the West Region Wildfire Council added an additional staff member who will work primarily in Gunnison County assisting County staff with implementation of the new wildfire resiliency code, property owners of both existing and new development with understand their wildfire risk and appropriate mitigation strategies and working with Emergency Management on implementation of the CWPP.

Comparison of the currently adopted IWUIC and the CWRC

Both the currently adopted IWUIC and the CWRC identify structure hardening and defensible space items depending on the wildfire hazard at the site.

The following items are areas where the County’s IWUIC adoption is **more** stringent than the CWRC and the items are further described below:

- Water supply requirements-not included in the CWRC

- Deck construction-CWRC regulates the decking surface only
- Vent opening locations-IWUIC prohibits vent openings in soffits and eaves
- Structure Ignition Zone 1 (0-5 feet)-CWRC has an exception for ignition-resistant plantings
- Accessory structures-Exempt in the IWUIC only if ≥ 50 feet from a habitable structure
- Application for large parcels-CWRC exempts ≥ 35 acres parcels with only one residence

Water supply requirements are not part of the CWRC. The IWUIC encourages parcels to have adequate water supplies for fire-fighting efforts by potentially reducing the amount of defensible space or degree of structure hardening. Water supply standards are costly for rural parcels. The stakeholder engagement group unanimously felt that water supply requirements should not be included in the new wildfire resiliency code and should be a consideration for new subdivisions and developments.

The CWRC requires that only the deck walking surface be regulated. The IWUIC requires that decks be constructed of ignition-resistant materials. The stakeholder engagement group supported the idea of only requiring decking material to be addressed, especially considering the exterior wall and metal flashing requirements.

The CWRC does not restrict the location of vent openings. The IWUIC prohibits vent openings in eaves and soffits, which is often the most desirable location for builders and designers. The stakeholder engagement group was supportive of removing the restrictions on vent opening locations.

The immediate 0-to-5-foot zone around a structure is designed to reduce or eliminate ember ignition and direct flame contact with the structure, decks, stairs and attachments. The County's adoption of the IWUIC allows only noncombustible, hard surface materials in this zone (i.e. rock, gravel, sand, concrete, bare earth or stone/concrete pavers). The CWRC has the same requirements with an exception that allows for ignition-resistant plantings, identified by the Colorado State Forest Service, in this zone. The Colorado State Forest Service guide for ignition-resistant landscape plants provides a recommended list of landscape plants with attributes that decrease ignitability, such as low oil or resin and moisture content, when properly maintained. The Wildfire Resiliency Code Board considered the requirements of the Insurance Institute for Business and Home Safety ("IBHS") for their Wildfire prepare Home Technical Standards in determining the requirements of the CWRC for insurance coverage and reduction of risk for damage or loss of structures from fire and tried to align with those requirements as much as possible and this is one exception. The allowance of ignition-resistant plantings within the immediate zone is one item that does not align with the IBHS standards. Recent updates to the IBHS Wildfire Prepared Home Technical Standards include ensuring the immediate zone is a noncombustible zone because it is a critical element in effective wildfire mitigation as seen in recent major wildfire conflagration events. The stakeholder engagement group supported **not** including the exception to allow for ignition-resistant plantings in the immediate zone. Ignition-resistant plantings would be difficult for building inspectors to verify, and the County does not currently have a maintenance inspection program. Allowing specific plantings within this zone will likely not translate to future property owners who might see an opportunity for additional vegetation.

The CWRC exempts detached accessory structures no greater than 120 square feet when located at least 10 feet from a habitable structure. The IWUIC exempts those structures when they are located at least 50 feet from a habitable structure. The current building code adoptions in Gunnison County exempt accessory structures no greater than 200 square feet from needing a building permit. Applying

the less stringent separation distance threshold is in better alignment with the adopted building codes and would be more efficient and practical to implement. The stakeholder engagement group supported the less stringent CWRC requirement excepting accessory structures less than 120 square feet when located at least 10 feet from a habitable structure.

Senate Bill 23-166 which established the Wildfire Resiliency Code Board with the task of defining the WUI and adopting statewide codes for new construction in WUI excluded “any thirty-five acre parcel with only one residential structure on it that does not abut a residential or commercial area” from needing to adhere to the code. Many of the 35-acre developments in the County are within the mapped areas of the WUI and established in layouts that do not provide adequate separation distance between adjacent building sites/envelopes commensurate with their overall acreage. Exempting those parcels from the wildfire code requirements is counterproductive to the goals of the wildfire code in creating wildfire ready and resilient communities. The stakeholder engagement group was supportive of continuing to apply the wildfire code to all parcels in the WUI regardless of size.

The following items are areas where the County’s IWUIC adoption is **less** stringent than the CWRC:

- Exterior wall embellishments and architectural trim-CWRC does not exempt window and door trim and allows only 5% of embellishments and other trim to be exempt
- Fencing-CWRC requires fencing within 8 feet of a structure be noncombustible or ignition-resistant
- Retaining walls-CWRC requires that retaining walls be noncombustible or ignition-resistant when within 8 feet of a structure, or integral to support of structures, or integral to egress
- Detached accessory structures (any size)-CWRC requires exterior wall material compliance when within 50 feet of a habitable or occupiable structure
- Ventilation openings-CWRC requires a mesh covering openings not to exceed 1/8” (versus ¼”)
- Additions and alteration-CWRC trigger is when 500 square feet or more is added versus 50% of the existing area.

The exterior wall requirements that apply when a property is in a moderate or high wildfire hazard area will apply to all trim work except for up to 5% of the square footage of the exterior wall for decorative embellishments or architectural trim. Decorative embellishments are elements incorporated in design and construction for an ornamental or decorative purpose that are not integral to the structure or structural support. Architectural trim does not include door or window trim but could include corner trim or other pieces. For example, a typical house 40 feet by 20 feet could have about 2,000 square feet of wall surface area and 100 square feet (or 5%) of embellishments and trim could be exempt from the exterior wall materials requirement.

The adopted building code exempts fences less than 7 feet in height from building permitting and the *Gunnison County Land Use Resolution* requires that fences in residential areas be limited in height to 6 feet. This combination of code requirements explains one of the reasons why the County has no record of building permits for fences. The CWRC requires that fences within 8 feet of a regulated structure be constructed with noncombustible or ignition-resistant materials. This will be a big change for our community and will require public outreach and engagement to communicate and successfully implement the new requirement for fencing.

The exterior walls of detached accessory structures (greater than 120 square feet) need to comply with the requirements (when in moderate or high wildfire hazard areas) when the location is within 50 feet of a building containing habitable or occupiable space. This is similar to our current requirements except that occupiable space has been added. Habitable Space is space in a building for living, sleeping, eating or cooking and Occupiable Space means a room or enclosed space designed for human occupancy in which individuals congregate for amusement, education or similar purposes or in which occupants are engaged at labor. Occupiable Space includes most commercial buildings, including industrial shop spaces and even agricultural and similar uses where people are actively engaged in labor.

Additions that increase the footprint of a structure by 500 square feet or more will need to comply with the requirements, for the addition only. Currently, the requirements for additions are where the area of the addition is more than 50% of the existing area does the area of the addition need to comply. The CWRC trigger of 500 square feet could be more stringent in some cases and less stringent in others depending on the size of the existing structure.

Recommendations

At their December 18, 2025, meeting, the Gunnison County Planning Commission reviewed the Colorado Wildfire Resiliency Code and the proposed amendments to that code as recommended by the stakeholder engagement group and unanimously recommended adoption of the following items to the Gunnison County Board of County Commissioners:

1. Adopt the Colorado Wildfire Resiliency Code and the State Wildfire Intensity Map, with the following local amendments:

a. Apply wildfire resiliency requirements to thirty-five-acre or larger parcels.

Although Senate Bill 23-166 allows an exemption for certain 35-acre parcels, many large-parcel developments in Gunnison County are located within mapped wildland-urban interface areas and are configured in ways that do not provide meaningful separation between structures. Exempting these parcels based solely on size would undermine the intent of the wildfire code and increase long-term community risk. Applying the code uniformly within the mapped WUI ensures consistent wildfire mitigation regardless of parcel size.

b. Require the Structure Ignition Zone 1 (0–5 feet) to consist only of noncombustible, hard-surface materials, without an exception for ignition-resistant plantings.

Maintaining a fully noncombustible immediate zone is one of the most effective wildfire mitigation measures and aligns with current best practices, including recent updates to the Insurance Institute for Business and Home Safety (IBHS) Wildfire Prepared Home standards. Eliminating the planting exception improves enforceability, reduces future maintenance and compliance challenges, and avoids confusion for subsequent property owners.

2. Adopt corresponding amendments to the Gunnison County Land Use Resolution (LUR) to align with the CWRC and State map adoption.

These amendments ensure consistency between land use regulations and building code requirements and support efficient, coordinated implementation. A summary of the proposed LUR amendments is provided in Appendix A.

Replacement of the IWUIC with the CWRC, as amended, will result in a wildfire resiliency code that is simpler, more consistent with statewide standards, and easier for applicants and staff to understand and implement. Adoption of the State wildfire intensity map shifts the responsibility for map maintenance and updates to the State of Colorado while providing a transparent, user-friendly tool with an established ground-truthing process.

Staff is requesting direction from the Board on whether to proceed with scheduling a public hearing for consideration of adoption of the CWRC and associated LUR amendments, or to schedule an additional work session for further discussion of specific policy items.

Please contact Crystal Lambert, Building and Environmental Health Official, with any questions. Thank you for your consideration.

APPENDIX A: SUMMARY OF PROPOSED REVISIONS TO THE GUNNISON COUNTY LAND USE RESOLUTION TO ALIGN WITH THE ADOPTION OF THE COLORADO WILDFIRE RESILIENCY CODE

SECTION 1-112: USE OF MAPS, C.MAPS TO BE USED AS REFERENCES, 1.WILDFIRE HAZARD MAPS.

- 1. WILDFIRE HAZARD MAPS.** Wildfire Hazard Maps prepared by Community Planning Assistance for Wildfire (CPAW) and as they may be amended from time to timeThe Colorado Wildfire Resiliency State Code Map prepared and maintained by the Colorado Division of Fire Prevention and Control and the Colorado State Forest Service and available on the Colorado Wildfire Resiliency Code Board website.

ARTICLE 2:DEFINITIONS

FIRE INTENSITY CLASSIFICATION means the level of fire intensity identified for areas where significant fuel hazards and associated dangerous fire behavior may exist, based upon vegetative fuels, topography, weather conditions, and flame length value. The Fire Intensity Classification for parcels in the WUI can be identified on the Colorado Wildfire Resiliency State Code Map prepared and maintained by the Colorado Division of Fire Prevention and Control and the Colorado State Forest Service and available on the Colorado Wildfire Resiliency Code Board website.

LOW FIRE INTENSITY CLASSIFICATION means areas with light to medium surface fuels, such as grasses, shrubs, and scattered low-density vegetation. These fuels are often discontinuous, which limits flame propagation but can sustain burning under moderate weather conditions. Fires in this class may occur on gentle to moderate slopes, where topography begins to influence the rate of spread. Although flame lengths remain relatively small-typically less than two feet-limited spotting may occur, especially with wind. Trained firefighters with protective equipment and standard hand tools can usually suppress these fire through direct attack, particularly on slopes under 30 percent. Mechanized equipment is typically unnecessary.

KEY CHARACTERISTICS INCLUDE:

- **FUELS:** Light to medium surface fuels, including grasses, shrubs, and scattered vegetation.
- **FLAME LENGTH:** Less than 2 feet.
- **RATE OF SPEAD:** Low, increasing with slopes over 20 percent.
 - **SPOTTING:** Very short-range spotting is possible under windy conditions.
 - **TERRAIN INFLUENCE:** More active fire behavior on moderate slopes (20 to 30percent)
 - **SUPPRESSION DIFFICULTY:** Easily suppressed by trained firefighters using basic protective gear and hand tools. Direct attack is effective, and mechanized support is rarely needed.

MODERATE FIRE INTENSITY CLASSIFICATION means areas with moderate to heavy fuel loads, such as dense shrubs, small trees, and accumulated ground fuels. Fire present continuous horizontal and vertical fuel arrangements, allowing flames to reach up to 8 feet in length. Fire behavior is notably influenced by moderate to steep slopes, often accelerating the spread. Short-range spotting becomes more common, complicating suppression efforts. Ground crews typically require mechanized support, such as engines and dozers, to establish control lines. Aircraft assistance may be necessary, particularly in inaccessible terrain. There is a significant increase in the potential for property damage and risk to life, especially in WUI areas.

KEY CHARACTERISTICS INCLUDE:

APPENDIX A: SUMMARY OF PROPOSED REVISIONS TO THE GUNNISON COUNTY LAND USE RESOLUTION TO ALIGN WITH THE ADOPTION OF THE COLORADO WILDFIRE RESILIENCY CODE

- **FUELS:** Moderate to heavy fuels, including dense shrublands, small trees, timber litter, and canopy fuels.
- **FLAME LENGTH:** Up to 8 feet.
- **RATE OF SPEAD:** Moderate to high, increasing significantly on slopes over 30 percent.
- **SPOTTING:** Short-range spotting is common.
- **TERRAIN INFLUENCE:** Steep slopes, 30 percent of greater, increases fire spread and intensity.
- **SUPPRESSION DIFFICULTY:** Challenging for ground crews without support from engines, dozers, or aircraft. Dozers and plows are generally effective on moderate terrain.

HIGH FIRE INTENSITY CLASSIFICATION means areas with heavy, continuous fuel loads, such as dense forest canopies, thick understory growth, and heavy dead/downed material. Fires frequently occur on steep slopes, often exceeding 40 percent, where topography dramatically increases the rate of spread and severity. Flame lengths can exceed 30 feet, and both short- and medium- range spotting are common, particularly in windy conditions. Direct suppression by ground crews is typically ineffective, requiring indirect attack strategies, such as backburns and aerial retardant drops. Fires in this class pose extreme risk to life, property, and firefighter safety, especially in rugged or remote areas.

KEY CHARACTERISTICS INCLUDE:

- **FUELS:** Heavy fuels, including dense forests, urban core areas with heavy fuel loads, and canopy-dominated regions.
- **FLAME LENGTH:** Up to 30 feet or more.
- **RATE OF SPEAD:** Rapid, on slopes over 40 percent.
- **SPOTTING:** Short-range spotting is common; medium range spotting is possible under windy conditions.
- **TERRAIN INFLUENCE:** Slopes over 40 percent amplify intensity and spread, creating dangerous conditions for suppression.
- **SUPPRESSION DIFFICULTY:** Direct attack by ground forces and dozers is generally ineffective. Indirect strategies (backburning, aerial support) are often necessary. These fire present a significant danger to life, property, and responder safety.

WILDFIRE HAZARD AREA means an area where potential wildfire phenomenon is so adverse to past, current or foreseeable construction or development that it constitutes a significant potential hazard to public health and safety or to property. Wildfire Hazard Areas contain low, moderate, and high Fire Intensity Classifications. Such areas may be shown on maps pursuant to Section 1-112: C: *Maps To Be Used As References* (also see FIRE INTENSITY CLASSIFICATION)

- ~~**LANDSCAPE-LEVEL WILDFIRE HAZARD** This scale represents the likelihood (probability) of a fire occurring and the intensity of the fire at the landscape level based on the inherent landscape characteristics, including broad existing vegetation, biophysical settings, fire regimes, and fire histories. The landscape-level hazard assessment is delineated into the following rankings:~~
 - ~~MODERATE~~

APPENDIX A: SUMMARY OF PROPOSED REVISIONS TO THE GUNNISON COUNTY LAND USE RESOLUTION TO ALIGN WITH THE ADOPTION OF THE COLORADO WILDFIRE RESILIENCY CODE

- HIGH
- VERY HIGH

The factors influencing these rankings can be used to determine the potential landscape-level exposure that a development will be subject to. The ranking at this scale is difficult to change at the local/parcel level. Mitigation affecting change at this scale is typically done by large-scale disturbances such as insect mortality, fires, or landscape-level mitigation.

- **LOCAL-LEVEL WILDFIRE HAZARD** This scale is based on an extreme event (worst fire days). This does not show the likelihood of a fire occurring but does show where fires are likely to burn at high intensity. For example, a fire that starts in an area where the local hazard is high can spread fast and burn at high intensity creating significant wildfire exposure to any structures in the area. The same rankings used at the landscape scale are used at this local scale:

- MODERATE
- HIGH
- VERY HIGH

WILDLAND URBAN INTERFACE (WUI) means any developed area where conditions affecting the combustibility of both wildland and built fuels allow for the ignition and spread of fire through the combined fuel complex that geographic area where structures and other human development meets or intermingles with wildland or vegetative fuels. The WUI is illustrated in the Colorado Wildfire Resiliency State Code Map prepared and maintained by the Colorado Division of Fire Prevention and Control and the Colorado State Forest Service and available on the Colorado Wildfire Resiliency Code Board website CPAW map titled, "Gunnison County Wildland Urban Interface."

WUI Intermix: Areas with ≥ 1 house per acre and ≥ 50 percent cover of wildland vegetation. These areas have a potential for exposure to radiant and convective heat, as well as airborne embers.

- **WUI Interface:** Areas with ≥ 1 house per acre and ≤ 50 percent cover of vegetation and within 1.5 mi of area with $\geq 75\%$ wildland vegetation.
- **Non-WUI Vegetated** (no housing): Areas with ≥ 50 percent cover of wildland vegetation and no houses (e.g., protected areas, steep slopes, mountain tops).

SECTION 5-104: ADMINISTRATIVE REVIEW PROJECT APPLICATION, E. ADDITIONAL SUBMITTALS BASED UPON INFORMATION AVAILABLE ON MAPS USED BY THE COUNTY, 3. LOCATION OF SITE WITHIN WILDFIRE HAZARD AREA:

3. **LOCATION OF SITE WITHIN WILDFIRE HAZARD AREA.** As applicable, an application proposing a land use change on a parcel located within a wWildfire hHazard aArea as identified on the Colorado Wildfire Resiliency Code map prepared and maintained by the Colorado Division of Fire Prevention and Control and the Colorado State Forest Service, pursuant to Section 11-105: *Development in Areas Subject to Wildfire Hazards.*

SECTION 6-104: MINOR IMPACT APPLICATION, F. ADDITIONAL SUBMITTALS BASED UPON INFORMATION AVAILABLE ON MAPS USED BY THE COUNTY, 3. LOCATION OF SITE WITHIN WILDFIRE HAZARD AREA:

3. **LOCATION OF SITE WITHIN WILDFIRE HAZARD AREA.** As applicable, an application proposing a land use change on a parcel located within a Wildfire hHazard aArea as identified on the Colorado Wildfire Resiliency State Code map prepared and maintained by the Colorado

APPENDIX A: SUMMARY OF PROPOSED REVISIONS TO THE GUNNISON COUNTY LAND USE RESOLUTION TO ALIGN WITH THE ADOPTION OF THE COLORADO WILDFIRE RESILIENCY CODE

Division of Fire Prevention and Control and the Colorado State Forest Service, pursuant to Section 11-105: *Development in Areas Subject to Wildfire Hazards*.

SECTION 7-201: SKETCH PLAN APPLICATION FOR MAJOR IMPACT PROJECTS, I. MAPS AND SITE PLAN SHEETS, 2. NATURAL FEATURES, d. WILDFIRE HAZARD MAPS:

- d. **WILDFIRE HAZARD MAPS.** Map of the area wildfire hazards and identification of the fire intensity classification(s) as identified on the Wildfire Area Hazard Maps-Colorado Wildfire Resiliency State Code Map prepared and maintained by the Colorado Division of Fire Prevention and Control and the Colorado State Forest Service and available on the Colorado Wildfire Resiliency Code Board website prepared by by Community Planning Assistance for Wildfire (CPAW).

SECTION 7-301: PRELIMINARY PLAN APPLICATION FOR MAJOR IMPACT PROJECTS, J. GEOLOGIC HAZARD AREAS, 3. WILDFIRE HAZARD AND FIRE PROTECTION:

3. **WILDFIRE HAZARD AND FIRE PROTECTION.** When a land use change is proposed on a parcel located in a Wildfire Hazard Area as identified on the Colorado Wildfire Resiliency State Code map prepared and maintained by the Colorado Division of Fire Prevention and Control and the Colorado State Forest Service ~~the~~ the narrative, map and layout design of the Preliminary Plan shall address and comply with the requirements of Section 11-105: *Development in Areas Subject to Wildfire Hazard* and Section 12-107: *Fire Protection*, and include measures to minimize the potential that the proposed uses will generate or increase wildfire

SECTION 11-104: DEVELOPMENT SUBJECT TO GEOLOGIC HAZARDS, G. STANDARDS APPLICABLE TO DEVELOPMENT IN PARTICULAR GEOLOGIC HAZARD AREAS, 6. DEVELOPMENT ON SLOPES GREATER THAN 30 PERCENT, e. DEVELOPMENT PROHIBITED:

- e. **DEVELOPMENT PROHIBITED.** Development shall be prohibited on any slope in excess of 30 percent that is also located in an area that is determined to be a very high wildfire hazard area with a High Fire Intensity Classification, pursuant to Section 11-104: C: *Applicability*.

SECTION 11-105: DEVELOPMENT IN AREAS SUBJECT TO WILDFIRE HAZARDS, C. MAPS INCORPORATED:

- C. **MAPS INCORPORATED.** The Colorado Wildfire Resiliency State Code Map prepared and maintained by the Colorado Division of Fire Prevention and Control and the Colorado State Forest Service and available on the Colorado Wildfire Resiliency Code Board website ~~The Gunnison County Wildfire Hazard Maps, prepared by the Community Planning Assistance for Wildfire, and Gunnison County GIS~~, shall be used as references for determining when parcels are located within wildfire hazard areas, pursuant to Section 1-112: *Use of Maps*. Where areas have not been mapped, review and analysis by the Colorado Forest Service shall determine the status of wildfire hazards. Copies of the maps are available on www.gunnisoncounty.org.

SECTION 11-105: DEVELOPMENT IN AREAS SUBJECT TO WILDFIRE HAZARDS, F. STANDARDS, 2. PROHIBITED LOCATIONS FOR DEVELOPMENT & 3. DEMONSTRATION OF COMPLIANCE:

2. **PROHIBITED LOCATIONS FOR DEVELOPMENT.** Development shall not be located in any area designated as having very High Fire Intensity Classification ~~wildfire hazard~~ that also has

APPENDIX A: SUMMARY OF PROPOSED REVISIONS TO THE GUNNISON COUNTY LAND USE RESOLUTION TO ALIGN WITH THE ADOPTION OF THE COLORADO WILDFIRE RESILIENCY CODE

slopes greater than 30 percent. Development shall also not be located in a fire chimney, as identified by the Colorado State Forest Service.

3. **DEMONSTRATE COMPLIANCE WITH THE COLORADO WILDFIRE RESILIENCY CODE~~INTERNATIONAL WILDLAND URBAN INTERFACE CODE (IWUIC)~~, AS ADOPTED AND AMENDED BY GUNNISON COUNTY.** All land use change applications shall comply with the standards set forth in the County-adopted version of the ~~International Wildland Urban Interface Code~~Colorado Wildfire Resiliency Code.

SECTION 11-105: DEVELOPMENT IN AREAS SUBJECT TO WILDFIRE HAZARDS, F. STANDARDS, 5. WILDFIRE PREVENTION STANDARDS TO BE ADDRESSED IN PROTECTIVE COVENANTS:

5. **WILDFIRE PREVENTION STANDARDS TO BE ADDRESSED IN PROTECTIVE COVENANTS.** Development shall comply with the following standards. Assurances as to compliance with these standards shall be addressed in a recorded, permanent protective covenant enforceable by the County.
 - a. **FUEL MODIFICATIONS.** If the proposed development includes areas that are within a wildfire hazard area containing low, moderate or high Fire Intensity Classifications as mapped on the Colorado Wildfire Resiliency State Code Map~~Gunnison County Wildfire Hazard Maps~~, that can be reduced to lower hazard ratings through thinning, clumping, reduction of "ladder" fuels (vegetation that may allow a fire to burn from ground level to lower tree branches), removal of hanging limbs near chimneys, creation of defensible space around structures, or other such modifications, then such modifications shall be accomplished and maintained by the applicant and or applicable homeowner's association.
 - b. **FUEL BREAKS.** Practical fuel break systems shall be installed as needed in locations that are approved by the Colorado State Forest Service.
 - c. ~~IGNITION~~**IGNITION RESISTANT CONSTRUCTION MATERIALS.** If the proposed development includes areas that are within a wildfire hazard area containing low, moderate or high Fire Intensity Classifications as mapped on the Colorado Wildfire Resiliency State Code Map ~~Gunnison County Wildfire Hazard Maps~~, construction materials that are ignition resistant shall be allowed and encouraged within the protective covenants.

SECTION 12-105: WATER SUPPLY, D. CALCULATION OF ADEQUACY OF SUPPLY, 6. ADEQUATE AND RELIABLE WATER SUPPLY:

Delete reference to the IWUIC

SECTION 12-107: FIRE PROTECTION, C. SIGNAGE AND ADDRESSING & D. FIRE SUPPRESSION:

- C. **SIGNAGE AND ADDRESSING.** All sites for proposed land use changes shall be signed and marked with address markers in accordance with the standards of the ~~IWUIC~~County's adoption of the Colorado Wildfire Resiliency Code and the International Building Code.
- D. **FIRE SUPPRESSION.** All development shall comply with the standards of ~~the International Wildland Urban Interface Code including~~ NFPA 1141 and 1142.

SECTION 13-111: LANDSCAPING AND BUFFERING, E. LANDSCAPING PLAN & I. LANDSCAPE ADJACENT TO BUILDINGS:

- E. **LANDSCAPING PLAN.** Applicants for a land use change shall prepare a landscaping plan if the land use change is a residential development that is classified as a Major Impact Project, or any

APPENDIX A: SUMMARY OF PROPOSED REVISIONS TO THE GUNNISON COUNTY LAND USE RESOLUTION TO ALIGN WITH THE ADOPTION OF THE COLORADO WILDFIRE RESILIENCY CODE

multiple-family residential development, mobile home community or recreational vehicle park, or commercial, industrial or other non-residential use that is classified as either a Minor or Major Impact Project, pursuant to Section 3-111: *Classification of Impact*. Information is available from the Colorado State Forest Service to assist in designing a landscaping plan that minimizes the potential for wildfire hazard. The landscaping plan shall comply with the standards of the Gunnison County adopted ~~International Wildland Urban Interface Code~~Colorado Wildfire Resiliency Code. The plan shall indicate the type and location of vegetation to be included on the site. The plan shall also contain a planting schedule and a plan for maintenance of all landscaping to be installed.

- I. **LANDSCAPE ADJACENT TO BUILDINGS.** Landscape elements may be located adjacent to buildings except that when sites that are designated as wildfire hazard areas, landscaping must be designed considering the need for defensible space as recommended by the Colorado Forest Service and in compliance with the County's adoption of the Colorado Wildfire Resiliency Code.

AGENDA ITEM or FINAL CONTRACT REVIEW SUBMITTAL FORM

Agenda Item: ADDED IN MTG - Wildfire Requirements for New Dev

Action Requested:

Parties to the Agreement:

Term Begins:

Term Ends:

Grant Contract #:

Summary:

Fiscal Impact:

Submitted by:

Submitter's Email Address:

Finance Review:

Required

Not Required

Comments:

Reviewed by:

Discharge Date:

County Attorney Review:

Required

Not Required

Comments:

Reviewed by:

Discharge Date:

Certificate of Insurance Required

Yes No

County Manager Review:

Comments:

Reviewed by:

Discharge Date:

Consent Agenda

Regular Agenda

Worksession

Time Allotted:

Agenda Date:

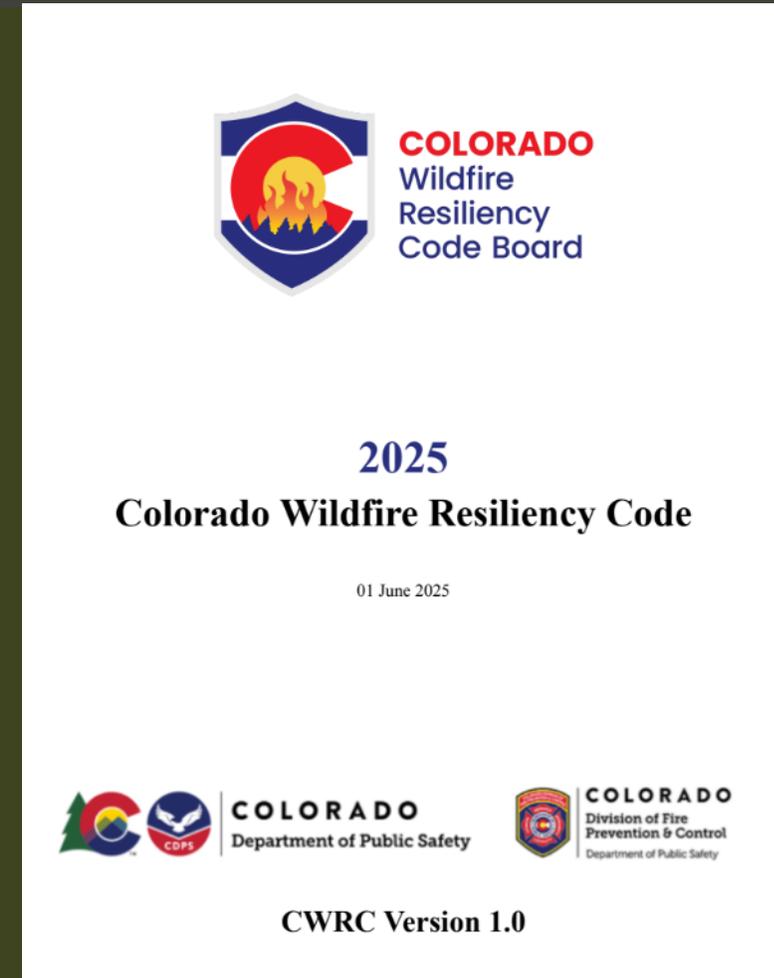
Gunnison County

Wildfire Code Update



STATE WILDFIRE RESILIENCY CODE

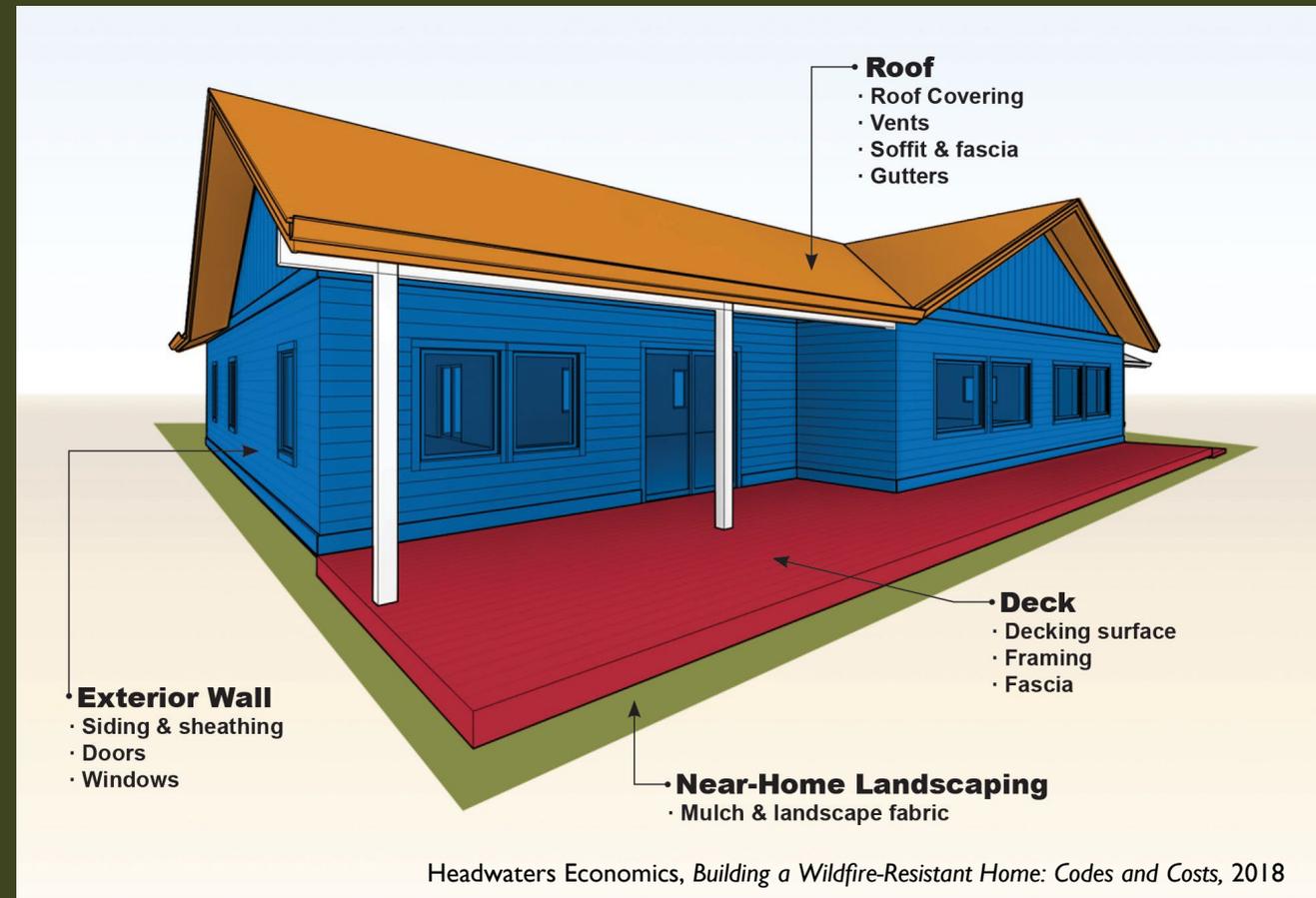
- SB23-166 established the Colorado Wildfire Resiliency Code Board tasked with adopting statewide codes and standards based on best practice approaches to hardening structures and reducing fire risk in the defensible space surrounding structures in the wildland-urban interface in Colorado.
- Jurisdictions shall adopt this code, or a code as stringent, by April 1, 2026.
- Enforcement of this code, or a code as stringent, shall be in accordance with the rules and regulations of the governing body.



IGNITION RESISTANT BUILDING MATERIALS

A type of building material that resists ignition or sustained flaming combustion sufficiently so as to reduce losses from wildfire exposure of burning embers and small flames.

- Roofs
- Gutters and downspouts
- Vents
- Fencing
- Decks
- Accessory buildings
- Eaves and soffits
- Walls
- Windows
- Doors
- Retaining walls



DEFENSIBLE SPACE / SITE MANAGEMENT

An area either natural or manmade, where material capable of allowing a fire to spread unchecked has been treated, cleared or modified to slow the rate and intensity of an advancing wildfire and to create an area for fire suppression operations to occur.

Zone 1, Immediate Zone, 0-5 feet- Design to reduce or eliminate ember ignition and direct flame contact with the structure.

Zone 2, Intermediate Zone, 5-30 feet-Designed to give an approaching fire less fuel, which will help reduce its intensity as it gets nearer to structures.

Zone 3, Expanded Zone, 30-100 feet-Focuses on mitigation to keep fire on the ground.



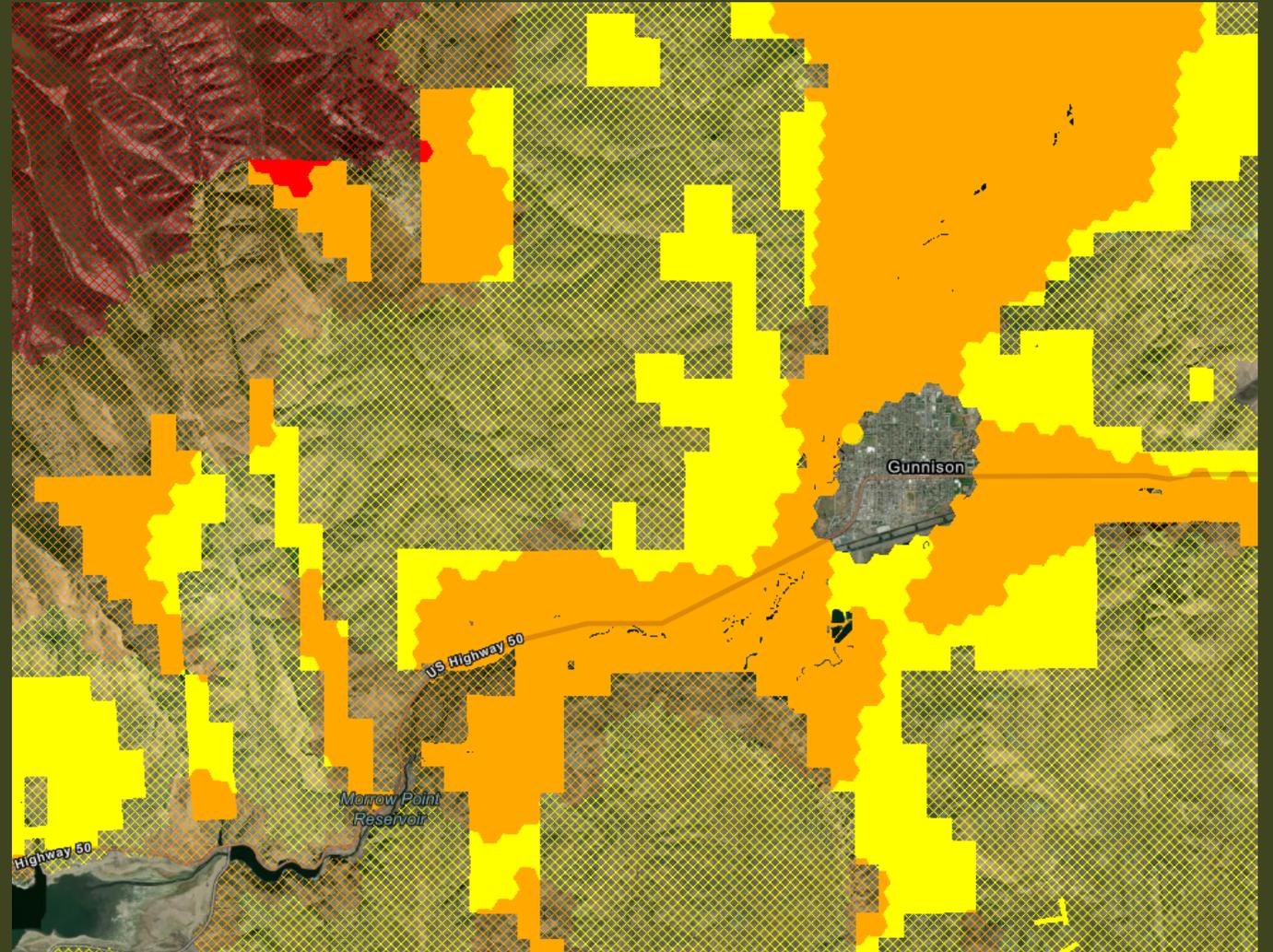
COLORADO WILDFIRE RESILIENCY CODE

Map layer intended to encompass both the current and potential Wildland Urban Interface, as defined by both the IWUIC and the WRCB, “that geographic area where structures and other human development meets or intermingles with wildland or vegetative fuels.”

Application is based upon illustrated fire hazard on the map

Class 1 - applies to all areas identified with low fire intensity classification (yellow)

Class 2 - applies to areas identified with moderate to high fire intensity classification (orange and red)



COLORADO WILDFIRE RESILIENCY CODE

The State map is developed to identify the areas of concern for fire hazards throughout Colorado for application of the Wildfire Resiliency Code.

<https://dfpc.colorado.gov/WRCB>

WRCB -

State Map



COLORADO WILDFIRE RESILIENCY CODE

Applies to new construction of structures and defensible space around structures-residential and commercial

Applies to significant alterations, additions, or repairs:

- An addition that increases the footprint of a structure by 500 square feet or more
- When 25% or more of exterior roof or walls are affected
- Does not apply to exterior painting, staining and similar routine maintenance work

Class 1 requirements:

- Roofing, gutters & downspouts, vents
- Retaining walls
- Fencing
- Signage & addressing
- Structure Ignition Zone 1 (0-5' from structure)

Class 2 requirements:

- All Class 1 requirements plus-
- Exterior walls, doors & windows
- Decking surface
- Appendages & projections
- Detached accessory structures
- Structure Ignition Zone 2 (5-30' from a structure)
- Structure Ignition Zone 3 (30-100' from a structure)

COMPARISON OF CURRENT WILDFIRE CODE FOR ITEMS THAT ARE **MORE** STRINGENT THAN THE STATE WILDFIRE RESILIENCY CODE

	Current County Wildfire Code	State Minimum Requirement
Water supply available for fire-fighting	Optional, however, compliant water supplies may lower the level of ignition-resistant construction required for building	Not included
Deck construction	Deck construction is required to meet the level of ignition-resistant construction, i.e. fire-retardant treated wood, heavy timber, non-combustible, etc.	Only decking walking surface is addressed
Vent opening locations	Not permitted in soffits, eave overhangs, between rafters at eaves, or in overhang areas.	No restriction on location
0-5 foot hardened zone around structures	Nonflammable, hard surface materials, such as rock, gravel, sand, cement, bare earth or stone.	Non-combustible, hard surface materials, such as rock, gravel, sand, concrete, bare earth or stone. Except ignition-resistant plantings are allowed in this zone.
Accessory structures less than 120 square feet	Exempt if they are at least 50 feet from a building containing habitable space.	Exempt if they are at least 10 feet from an occupiable structure.
Application of the code	The code applies to all parcels in the mapped areas of the wildland urban interface.	Applies to all parcels in the mapped areas of the wildland urban interface, except 35 acre or greater parcels with only one dwelling when abutting a residential or commercial area.

COMPARISON OF CURRENT WILDFIRE CODE FOR ITEMS THAT ARE **LESS** STRINGENT THAN THE STATE WILDFIRE RESILIENCY CODE

	Current County Wildfire Code	State Minimum Requirement
Exterior wall embellishments and architectural trim	Requirements are not applied to trim or embellishments	Up to 5% of the square footage of the *exterior wall is exempt everything else needs to meet the exterior wall material requirements.
Fencing	Not included in current wildfire code.	Fencing within 8 feet of a structure shall be constructed with noncombustible or ignition-resistant materials. Except: Vinyl fencing may be allowed.
Retaining Walls	Not included in current wildfire code.	Shall be constructed of noncombustible or ignition-resistant materials when any of the following exist: <ol style="list-style-type: none"> 1. Within 8 feet of a structure 2. The wall is integral to the structure's support 3. The wall is integral to egress from a structure
Detached accessory structures	Exterior walls shall comply with material requirements when located less than 50 feet from a building containing habitable space	Exterior walls shall comply with material requirements when located less than 50 feet from a building containing habitable or occupiable space.
Ventilation openings	Covered with noncombustible corrosion-resistant mesh with openings not to exceed 1/4" or shall be designed to prevent flame or ember intrusion.	ASTM E2886 or covered with noncombustible corrosion-resistant mesh with openings not to exceed 1/8".
Additions and alterations	Additions where the area of the addition is more than 50% of the existing area. New covered deck or porch additions not exceeding 200 sf are exempt.	Additions or alterations that increase the footprint by 500 sf or more. Replacements of exterior walls or roof coverings where 25% or more are replaced.

STAKEHOLDER ENGAGEMENT

Representatives from our local construction industry with experience in using the current wildfire code:

- Building contracting
- Landscape architecture
- Materials supply
- Development and structure design

Fire Districts

West Region Wildfire Council

Discussed the State Wildfire Resiliency Code versus our current wildfire code requirements.

Recommendations:

- Adopting the State Wildfire Resiliency Code with local amendments.
- Utilize the State map for implementation of the code.
- Not including water supply requirements for development of individual parcels.
- Retaining the 0-5' immediate zone as a hardened area.
- Use the State minimum requirements for deck construction.
- Apply the code to all parcels in the mapped WUI without the exception of 35 acre or larger parcels.

IGNITION-RESISTANT VEGETATION

Plants that are less likely to readily ignite from a flame or other ignition source and produce fewer embers. While they can still be damaged by fire, their foliage and stems don't significantly contribute to the intensity of the fire.



COLORADO STATE UNIVERSITY
EXTENSION



Ignition-Resistant Landscape Plants

Fact Sheet 6.305 | Wildfire Mitigation Series, Landscaping and Planting

Introduction

In Colorado's wildland-urban interface (WUI), it isn't a matter of if a wildfire will impact residences and properties, but when. The WUI includes any areas where structures and other human developments meet or intermingle with wildland vegetative fuels, including grasses, shrubs and trees. Wildfire is a natural part of Colorado's varied ecosystems. Planning ahead and taking action to reduce the risk of wildfire can increase the likelihood a home survives when wildfires do occur. Firefighters do their best to protect residents, but ultimately, it's residents' responsibility to protect their property and investments from wildfire.

Homeowners should focus on actions that are effective in reducing wildfire hazards on properties. These efforts should always begin with the home or structure and progress outward. Defensible space is the area around a home or other structure that has been modified to reduce fire hazards by creating space between potential fuel sources.

In the defensible space, both natural and engineered materials are treated, removed or reduced to slow

the spread of wildfire and alter fire behavior. Ignition-resistant plants should be selected for planting, especially closer to the home.

Creating an effective defensible space involves establishing a series of management zones. Develop these zones around each building, including detached garages, storage buildings, barns and other structures. Recognize that fuel continuity and density play a critical role in wildfire behavior. Zones are defined from the structure edge in feet:

Zone 1: 0-5 feet

Zone 2: 5-30 feet

Zone 3: 30-100 feet

This fact sheet covers plants in zones 1 and 2; a different publication, Fire-Adapted Landscaping Practices (Fact Sheet 6.303), discusses plants in zones 2 and 3. For a defensible space plan for properties, contact the nearest Colorado State Forest Service field office or local CSU Extension office for guidance. Consult with a forester, fire department staff or community organization appropriately trained in wildfire mitigation practices.



Illustration: Bonnie Palmatroy, Colorado State University



Quick Facts

- The right plants around structures are important for wildfire safety.
- Management of defensible space and plant types is essential.
- Plants rated 10 have the least ignitability.
- This fact sheet recommends ignition-resistant plants for zones 1 and 2.

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Updated 7/2025

extension.colostate.edu

CLASS I REQUIREMENTS-LOW WILDFIRE HAZARD (YELLOW ON MAP)

Exterior Building Materials

Roof-Covering or assembly classified as Class A when tested in accordance with ASTM E108 (UL790).

- Flame and ember protection of roofs-For roof assemblies where the roof covering profile creates a space between the roof deck, the space shall resist the entry of flames and embers.
- Roof Valley Flashing-No. 26 galvanized steel gage corrosion-resistant metal installed over a minimum 36" wide underlayment consisting of one layer of cap sheet complying with ASTM D3909 running the full length of the valley.

Gutters and downspouts-shall be constructed of noncombustible material.

Ventilation Openings-For enclosed attics, enclosed rafter spaces, and underfloor spaces shall be either:

- Tested in accordance with ASTM E2886, or
- Noncombustible corrosion-resistant mesh with openings not to exceed 1/8"

CLASS I REQUIREMENTS-LOW WILDFIRE HAZARD (YELLOW ON MAP)

Site and Area

Structure Ignition Zone I (0-5'), Immediate Zone

- Designed to reduce or eliminate ember ignition and direct flame contact with the structure, decks, stairs, and attachments.
- Use noncombustible, hard surface materials in this zone, such as rock, gravel, sand, concrete, bare earth or stone/concrete pavers.
 - **Exception:** Ignition-resistant plantings, per an approved list by the AHJ that is not less than that created by the Colorado State Forest Service, may be allowed in the Immediate Zone.
- Remove all plantings including shrubs, slash, combustible mulch and other woody debris, with the exception of ignition-resistant vegetation.
- No planting of new trees in the immediate zone. Mature trees of no less than 10-inch diameter at 4.5 feet above ground level may be maintained. Tree crowns extending to within 10 feet of any structure shall be pruned to maintain a minimum clearance of 10 feet. Prune tree branches to a height of 6-10 feet from the ground or a third of the total height of the tree, whichever is less.

CLASS I REQUIREMENTS-LOW WILDFIRE HAZARD (YELLOW ON MAP)

Site and Area –Continued...

Site Signage

- Marking of Roads-Approved signs or other approved notices shall be provided and maintained for access roads and driveways to identify such roads and prohibit the obstruction thereof.
- Marking of fire protection equipment-Fire protection equipment and fire hydrants shall be clearly identified. (Don't disguise a hydrant as a shrub)
- Address markers-Buildings shall have a permanently posted address, which shall be placed at each driveway entrance and be visible from both directions of travel along the road.

Retaining Walls-Constructed with either noncombustible or ignition-resistant materials when any of the following conditions exist:

- 1.The wall is within 8 feet of a structure regulated by this code.
- 2.The wall is integral to the support of a structure.
- 3.The retaining wall is integral to the egress from a structure to a public way.

Fencing-Fencing within 8 feet of a structure shall be constructed with noncombustible or ignition-resistant materials. **Exception:** Vinyl fencing may be allowed.

CLASS 2 REQUIREMENTS-MODERATE OR HIGH WILDFIRE HAZARD (ORANGE OR RED ON MAP)

Exterior Building Materials

All the Class 1 items-Roof, gutters and downspouts, and ventilation openings.

Eaves and soffits shall be protected on the exposed underside by noncombustible, ignition-resistant, 1-hour fire-resistance-rated, 5/8" type X sheetrock, 2" nominal dimension lumber, or 1" nominal fire-retardant-treated wood.

Decks-Decking walking surface:

- Noncombustible materials
- Class A rated material
 - Except:** composite decking can be Class B rating
- Fire-retardant treated wood identified for exterior use
- Ignition-resistant building materials

Glazing-Multilayered panels, tempered, or have a fire protection rating not less than 20 minutes.

Exterior Doors-Noncombustible materials, solid core wood at least 1 3/4" thick, or 20 minute FPR

CLASS 2 REQUIREMENTS-MODERATE OR HIGH WILDFIRE HAZARD (ORANGE OR RED ON MAP)

Exterior Building Materials-Continued...

Exterior Walls shall be constructed with one of the following methods:

1. Assemblies with a minimum of 1-hour fire-resistance rating, rated for exposure on the exterior side.
2. Approved noncombustible materials
3. Heavy timber or log wall construction
4. Noncombustible materials
5. Fire-retardant treated wood labeled for exterior use
6. Ignition-resistant materials

Such materials shall extend from the top of the foundation to the underside of the eave or the underside of the roof sheathing.

Exceptions:

1. Exterior wall embellishments and architectural trim (exclusive of trim on exterior windows and doors) not to exceed 5 percent of the square footage of the exterior wall.
2. Roof or wall top cornice projections and similar assemblies.
3. Solid wood rafter tails and solid wood blocking installed between rafters having a minimum dimension of 2" nominal.

CLASS 2 REQUIREMENTS-MODERATE OR HIGH WILDFIRE HAZARD (ORANGE OR RED ON MAP)

Exterior Building Materials-Continued...

Exterior walls continued-

Exterior wall coverings-Coverings shall be limited to the following:

1. Noncombustible materials.
2. Fire-retardant-treated wood.
3. Ignition-resistant building materials.

Exception: where options 1 or 2 (in Section 404.3 are used, vinyl siding may be used as an exterior covering.

Flashing-A minimum of 6 inches of metal flashing or noncombustible material applied vertically between the wall sheathing and the exterior cladding shall be installed at the ground, decking, and roof intersections.

Detached Accessory Structures located less than 50 feet from a building containing *habitable* or *occupiable* space shall have exterior walls constructed in accordance with Sections 404.3-404.3.2.

Underfloor Enclosure- Buildings or structures shall have underfloor areas enclosed to the ground or comply with the exterior walls in accordance with Section 404.3 (exterior walls).

Appendages and Projections shall be constructed in accordance with Section 404.3 (exterior walls).

CLASS 2 REQUIREMENTS-MODERATE OR HIGH WILDFIRE HAZARD (ORANGE OR RED ON MAP)

Exterior Building Materials-Continued...

Vehicle Access Doors shall resist ember intrusion by preventing gaps larger than 1/8". Gaps between doors and door openings shall be controlled by one of the following methods:

- Weather stripping
- Door overlaps onto jambs and headers.
- Garage door jambs and headers covered with metal flashing.

CLASS 2 REQUIREMENTS- REQUIREMENTS- MODERATE OR HIGH WILDFIRE HAZARD (ORANGE OR RED ON MAP)

Site and Area

All the Class 1 requirements- 0-5' immediate zone, retaining walls, fencing, site signage

Structure Ignition Zone 2 (5-30 feet), Intermediate Zone

Designed to give an approaching fire less fuel, which will help reduce its intensity as it gets nearer to structures.

- Dead Material shall be removed from live vegetation
- Fuels Accumulation-Avoid large accumulations of surface fuels such as logs, branches, slash and combustible mulch.
- Trees-Tree crowns extending to within 10 feet of any structure shall be pruned to maintain a minimum clearance of 10 feet. Prune tree branches to a height of 6-10 feet from the ground or a third of the total height of the tree, whichever is less.
- Shrubs-Shrub groups within this zone shall be spaced to prevent structure ignition. Shrubs shall be at least 10 feet away from the edge of tree branches.

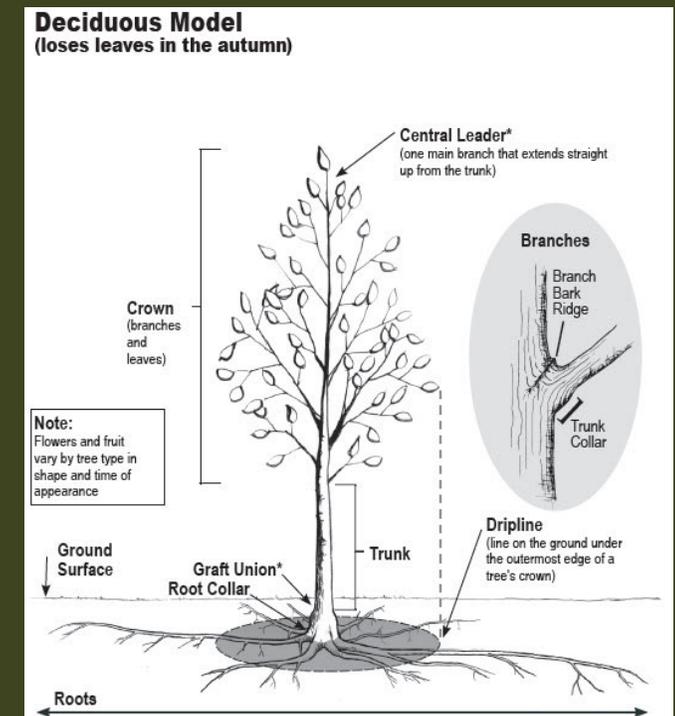
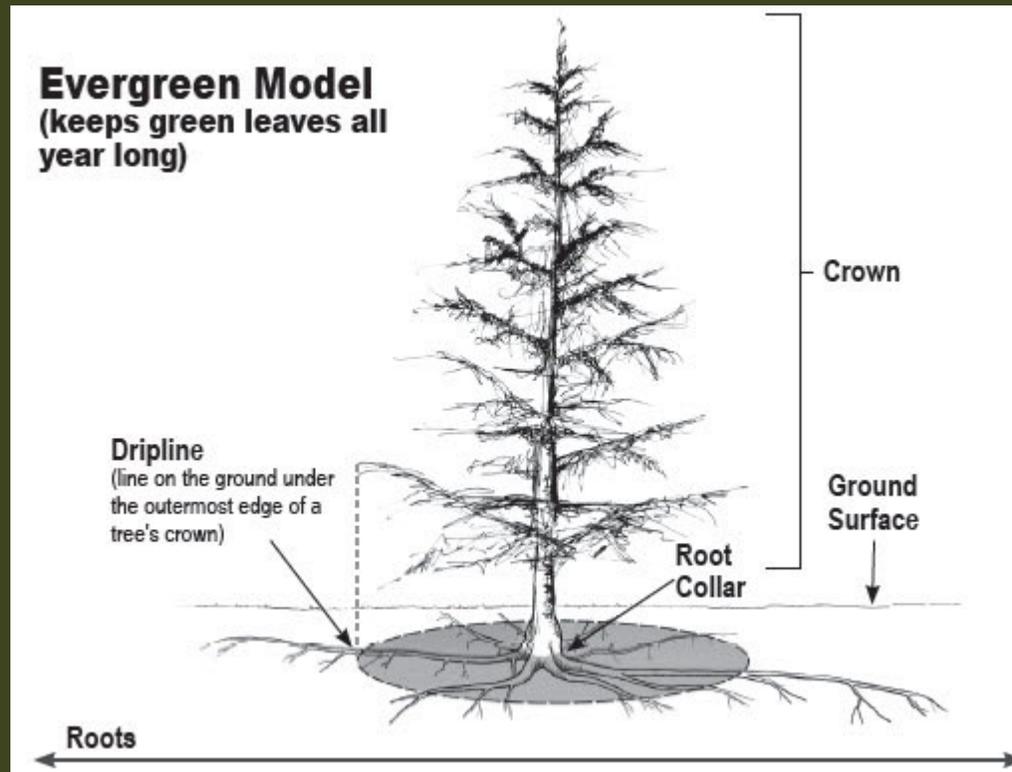
CLASS 2 REQUIREMENTS- REQUIREMENTS- MODERATE OR HIGH WILDFIRE HAZARD (ORANGE OR RED ON MAP)

Site and Area, continued...

Structure Ignition Zone 3 (30-100 feet), Expanded Zone

Focuses on mitigation that keeps fire on the ground.

- Tree crowns within this zone shall be spaced at a minimum of 6-10 feet.



DEFINITIONS

Habitable Space means a space in a building for living, sleeping, eating or cooking.

Occupiable Space means a room or enclosed space designed for human occupancy in which individuals congregate for amusement, education or similar purposes or in which occupants are engaged at labor.

Log Wall Construction means a type of construction in which exterior walls are constructed of solid wood members and where the smallest horizontal dimension of each solid wood member is not less than 6 inches.

Heavy Timber Construction is as specified in the International Building Code for a Type IV Construction (building elements are mass timber or noncombustible, or a combination of both) with minimum dimensions and permitted materials specified, in part, in accordance with Section 2304.11

DEFINITIONS

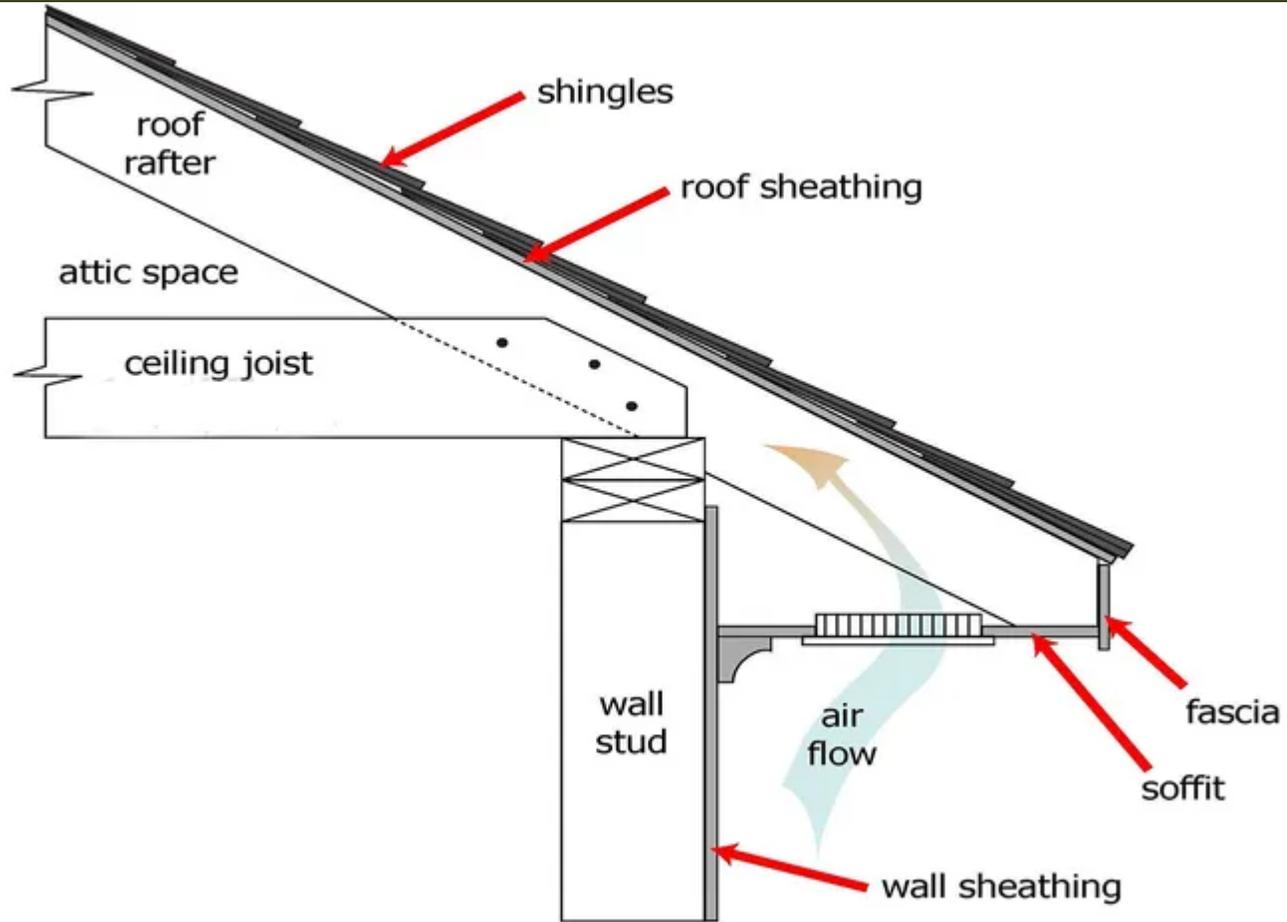
Ignition-resistant building materials

Same test as for Fire-retardant-treated wood for 30 minutes. Materials that melt, drip or delaminate to the extent that the flame front is interrupted are not permitted.

Weathering- Ignition-resistant building materials shall meet the performance requirements for weathering (including exposure to temperature, moisture, and ultraviolet radiation) as applicable to the materials and conditions of use.

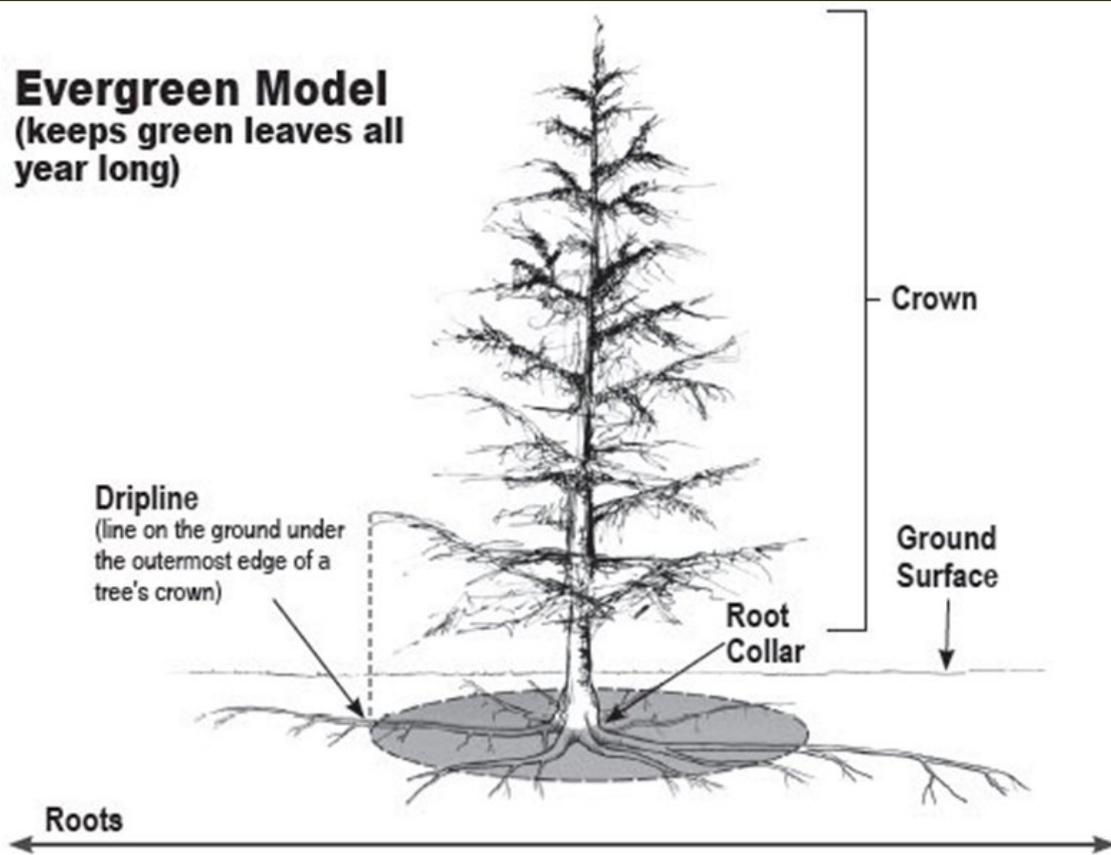
- Fire-retardant treated wood, wood-plastic composite materials, plastic lumber materials shall be tested after weather in accordance with Method “A” of ASTM D2898.
- Wood-plastic composite materials-Additional testing to demonstrate acceptable fire performance after weathering, ASTM E1354 and D7032.
- Plastic-lumber materials-Additional testing to demonstrate acceptable fire performance after weathering, ASTM E1354 and D6662.

EAVES, SOFFITS, AND FASCIAS

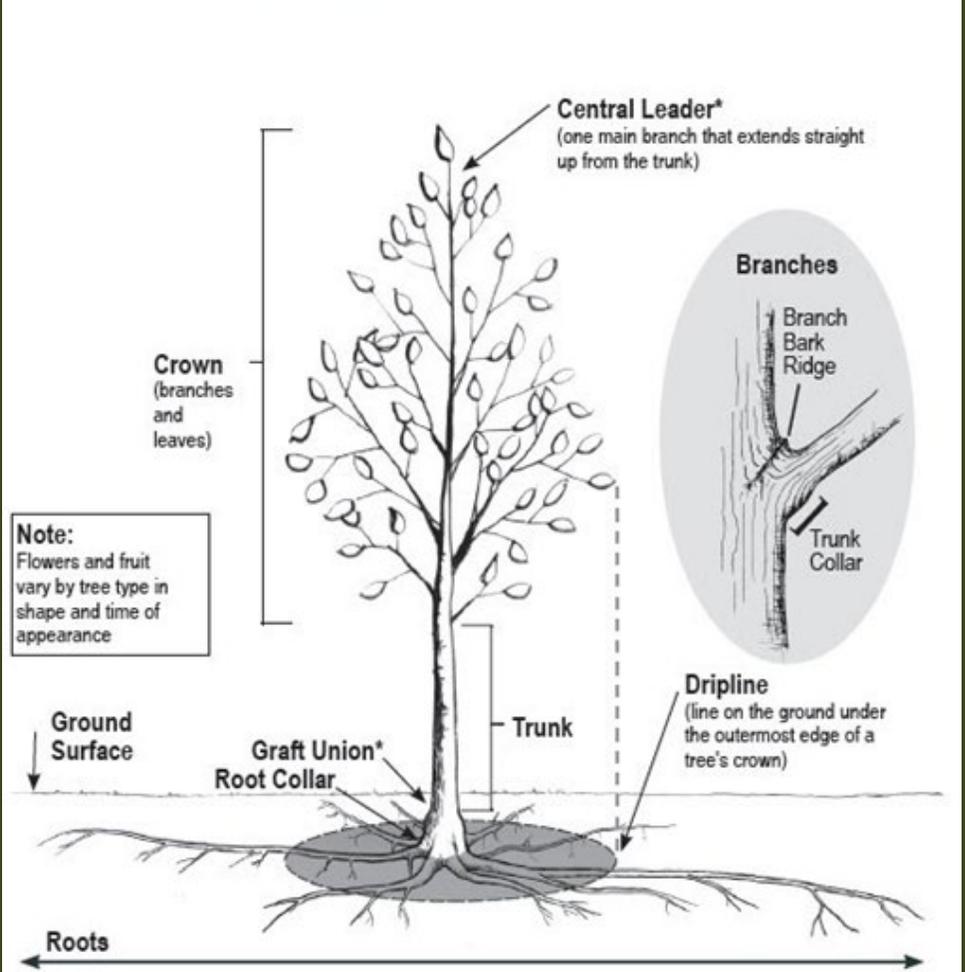


TREE PARTS

Evergreen Model (keeps green leaves all year long)

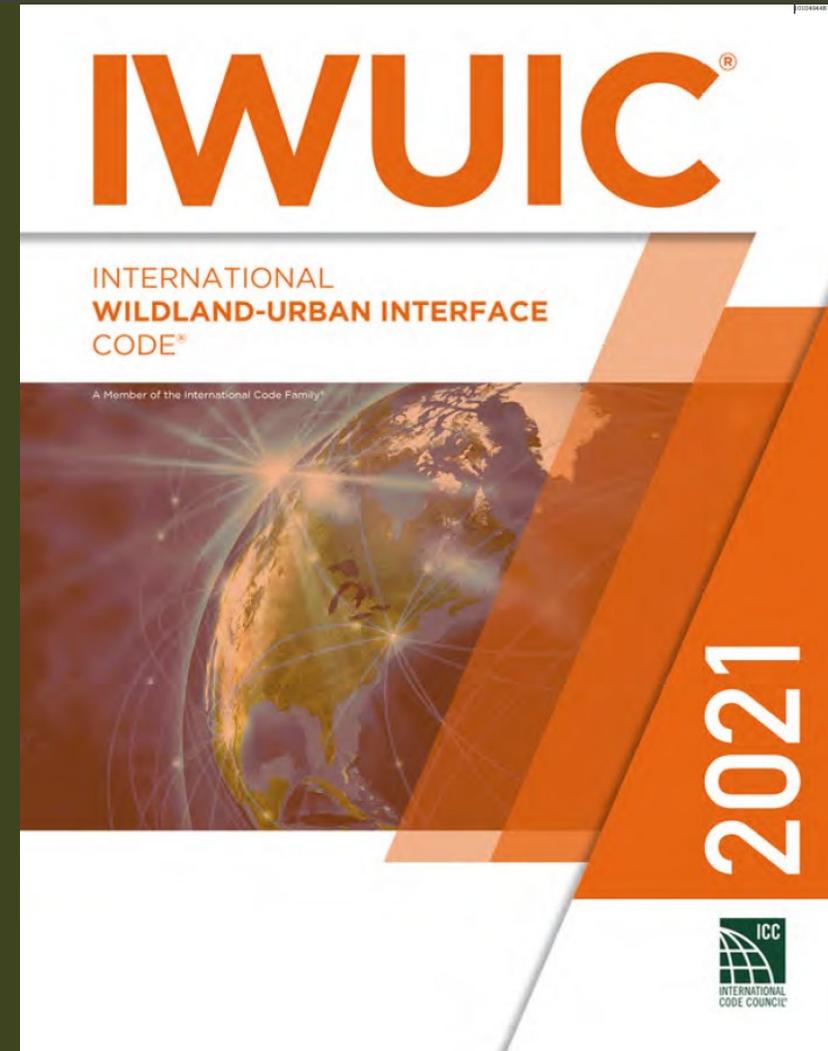


Deciduous Model (loses leaves in the autumn)



CURRENT COUNTY WILDFIRE CODE

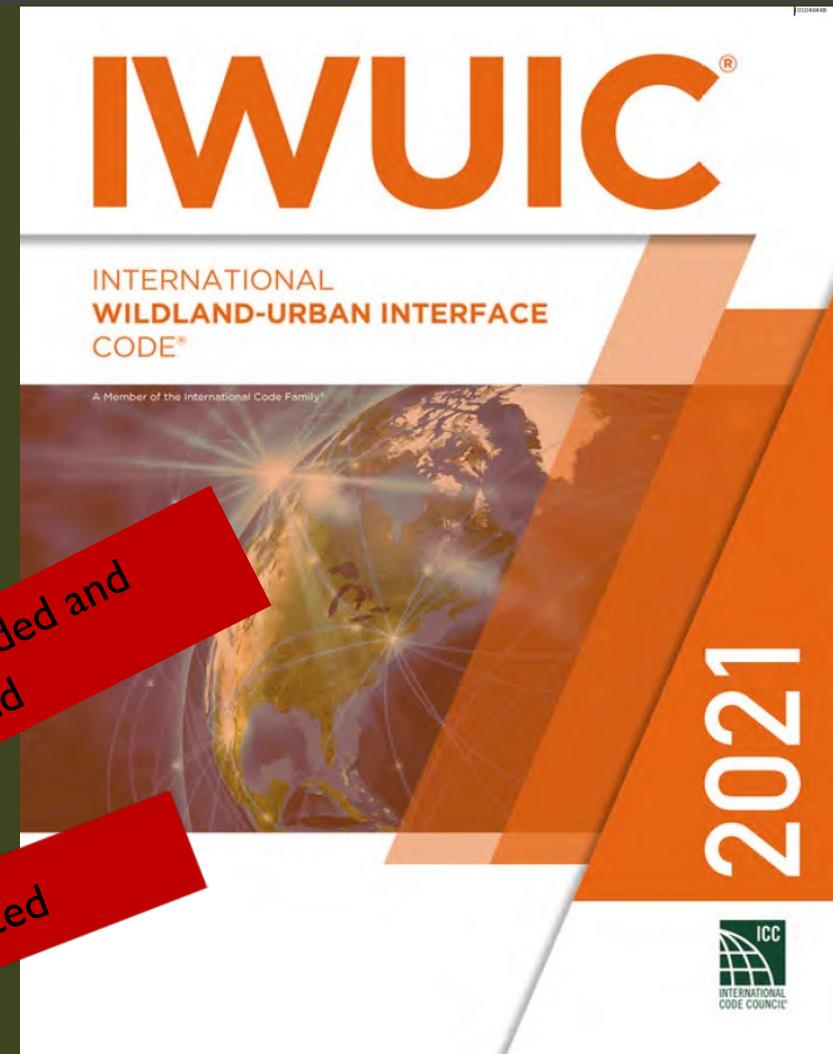
- In 2018, the County was awarded a grant and began working with the Community Planning Assistance for Wildfire (CPAW) to understand our wildfire risk and the mitigation efforts we could employ to reduce our risk, including adopting a wildfire code for new development.
- IWUIC initially adopted September 2022 with implementation on January 1, 2023.
- Amendments to the IWUIC to address additions and alterations and deletion of sprinklering were adopted in November 2023.
- Current wildfire hazard mapping was created through the CPAW program in 2018-2019 and is overdue for an update to remain accurate and relevant.



CURRENT COUNTY WILDFIRE CODE

Contains regulations intended to work synergistically to reduce the risk of a structure igniting during a wildfire and, conversely, prevent a structure fire from spreading to other structures and to the wildland.

- **Ignition-Resistant Construction:** 3 levels requiring specific materials and construction techniques for new buildings and substantial renovations to resist ignition from embers and direct flame contact.
- **Defensible Space:** Regulating vegetation management and the separation of fuels around structures.
- **Emergency Access and Water Supply:** Standards for driveways, private roads, and available water sources to ensure effective fire suppression operations.
- **Automatic Sprinkler Systems:** Required in certain high hazard scenarios.



DEFINITIONS

Heavy Timber, continued

Minimum dimensions of heavy timber shall comply with the applicable requirements of Table 2304.11 based on roofs or floors supported and the configuration of each structural element, or in Sections 2304.11.2 through 2304.11.4.

2304.11.2.1 Exterior Walls-permitted to be cross-laminated timber not less than 4” in thickness.

2024 International Building Code (IBC)

CHAPTER 23 WOOD

TABLE 2304.11 MINIMUM DIMENSIONS OF HEAVY TIMBER STRUCTURAL MEMBERS

SUPPORTING	HEAVY TIMBER STRUCTURAL ELEMENTS	MINIMUM NOMINAL SOLID SAWN SIZE		MINIMUM GLUED-LAMINATED NET SIZE		MINIMUM STRUCTURAL COMPOSITE LUMBER NET SIZE	
		Width, inch	Depth, inch	Width, inch	Depth, inch	Width, inch	Depth, inch
Floor loads only or combined floor and roof loads	Columns; Framed sawn or glued-laminated timber arches that spring from the floor line; Framed timber trusses	8	8	6 3/4	8 1/4	7	7 1/2
	Wood beams and girders	6	10	5	10 1/2	5 1/4	9 1/2
Roof loads only	Columns (roof and ceiling loads); Lower half of: wood-frame or glued-laminated arches that spring from the floor line or from grade	6	8	5	8 1/4	5 1/4	7 1/2
	Upper half of: wood-frame or glued-laminated arches that spring from the floor line or from grade	6	6	5	6	5 1/4	5 1/2
	Framed timber trusses and other roof framing; ^a Framed or glued-laminated arches that spring from the top of walls or wall abutments	4 ^b	6	3 ^b	6 7/8	3 1/2 ^b	5 1/2

For SI: 1 inch = 25.4 mm.

1. a.

Spaced members shall be permitted to be composed of two or more pieces not less than 3 inches nominal in thickness where blocked solidly throughout their intervening spaces or where spaces are tightly closed by a continuous wood cover plate of not less than 2 inches nominal in thickness secured to the underside of the members. Splice plates shall be not less than 3 inches nominal in thickness.

2. b.

Where protected by approved automatic sprinklers under the roof deck, framing members shall be not less than 3 inches nominal in width.

DEFINITIONS

Fire-Retardant-Treated Wood means any wood product that, when impregnated with chemicals by a pressure process or other means during manufacture, shall have, when tested in accordance with ASTM E84 or UL 723, a listed flame spread index of 25 or less. The ASMT E84 or UL 723 test shall be continued for an additional 20-minute period, and the flame front shall not progress more than 10.5 feet beyond the centerline of the burners at any time during the test.

- For wood products impregnated with chemicals by a pressures process, the process shall be performed in closed vessels under pressures not less than 50 pounds per square inch.
- For wood products impregnated with chemicals by other means during manufacture, the treatment shall be an integral part of the manufacturing process of the wood product. The treatment shall provide permanent protection to all surfaces of the wood product. The use of paints, coating, stains or other surface treatments is not an approved method of protection.
- Additional evaluation requirement for weathering, ASTM D2898. The test specimen shall be subjected to actual or accelerated weathering prior to fire testing.
 - Method “A” of ASTM D2898- “800-inch rain test”, 12 one-week condition cycles of 96 hours of water exposure and 72 hours of drying at 140 degrees F.
 - Method “B” of ASTM D2898- 1,000hours of 24-hour exposures featuring four hours of wetting, four hours of drying and eight hours of resting, with drying time at 150 degrees F with continuous UV exposure.

DEFINITIONS

ASTM E84 or UL 723 test (Steiner Tunnel Test)

Exposure of a 24 foot long by 20-inch-wide specimen to a controlled airflow and fire exposure to the fame of the specimen via two burners. The test measures how far and how fast flames spread across the test specimen's surface. During the standard 10-minute test, the specimen is monitored for flame spread through the windows on the side of the tunnel, and smoke development is measured through a light obscuration meter.

The specimen's Flame-Spread Index and Smoke Developed Index are computed from the recorded test data.



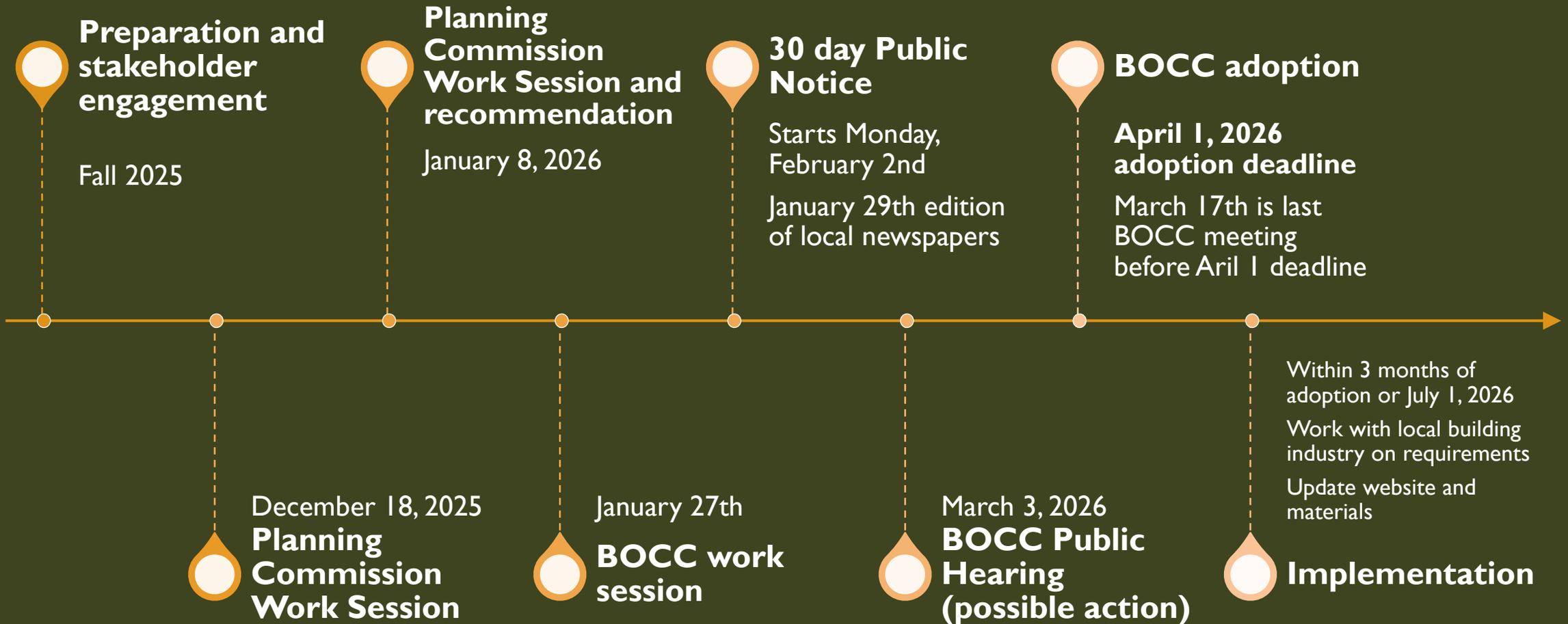
An Act

SENATE BILL 23-166

Section 24-33.5-1236.(III)

A combined approach of structure hardening and reducing fire risk in the defensible space surrounding structures is necessary to reduce the risk of damage to Colorado communities from the effects of wildfires. This risk includes the loss of life, homes, businesses, and other structures and the loss of jobs and economic vitality. Risk evaluation is based on many factors, including proximity to structures more resilient to ignition and involves best practices to protect a structure from the risk of wildfire and to prevent a structure fire from starting a wildfire.

WILDFIRE CODE UPDATE TIMELINE



WHY A WILDFIRE RESILIENCY CODE?

Wildfires in Colorado have increased in both frequency and size since 1990, with especially rapid growth in the 21st century.

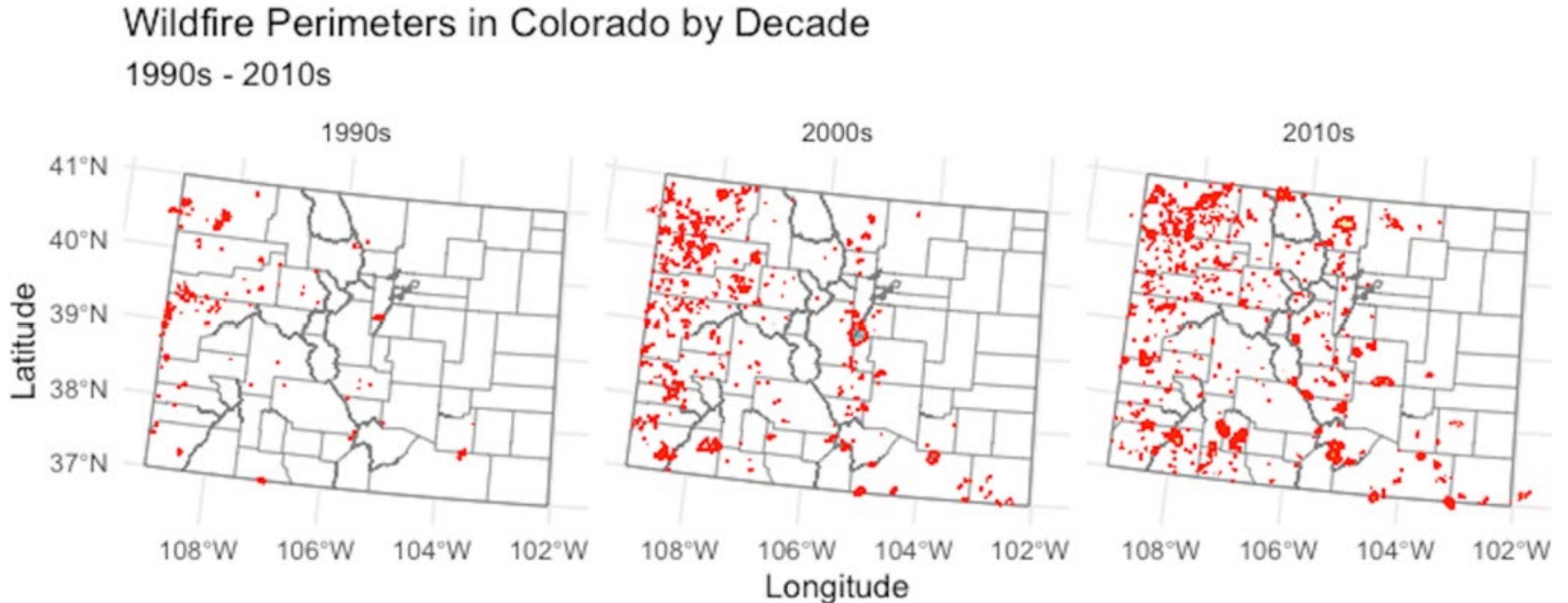


Figure 3: Wildfire Boundaries by Decade

WHY A WILDFIRE RESILIENCY CODE?

Colorado's Most Destructive Fires by Homes Lost

Rank	Fire	Homes Lost	Year
1	Marshall	1,084	2021
2	Black Forest	489	2013
3	East Troublesome	366	2020
4	Waldo Canyon	346	2012
5	High Park	259	2012



East Troublesome Fire, October 2020

IMPACTS OF WILDFIRE ON A COMMUNITY

Impacts of fire extend beyond immediate damage to homes and landscapes.

- Increased risk of flooding and erosion due to post wildfire flows with increased risk of mudslides after rain events.
- Damage to watersheds threatens drinking water supplies and aquatic species.
- Health risks to vulnerable populations due to poor air quality.
- Communities affected by wildfires experience economic losses with decreased home values, loss of businesses, negative impacts to agriculture, tourism, and recreation.
- Substantial recovery costs for debris removal, erosion control and rebuilding.



Wildfire Burn Scars Fires can have devastating impacts on water quality, as burned areas experience increased erosion of soil and debris into streams. © Jason Houston



